

**Criminal/Civil Complaint Report**

<https://www.majestic111.com>  
<http://www.the-truth-about-the-dept-of-energy.com>  
<https://san-francisco-news.com>

***Provided to:***

**UNITED STATES FEDERAL BUREAU OF INVESTIGATION, DEPARTMENT OF  
JUSTICE, FINCEN, PUBLIC OUTLETS AND RELATED LAW ENFORCEMENT AND  
REGULATORY AGENCIES**

Originally filed Dec. 26, 2007  
Revision: 5.3, Filed April 15, 2022  
Based on updated evidence data from Congressional  
reports, federal investigators and forensic analysts

)  
)  
) **PER CASES, CRIMINAL REFERRALS**  
) **AND FEDERAL COMPLAINTS NOW**  
) **FILED IN FEDERAL COURTS AND**  
) **WITH SUPPORTING INVESTIGATIONS**  
) **INCLUDING ‘DURHAM’, ‘BIDEN’,**  
) **‘FACEBOOK’, ‘SOLYNDRA’,**  
) **‘GOOGLE’, ‘TESLA’ AND RELATED**  
) **SEC ‘STOCK MARKET PAYOLA’**  
) **INVESTIGATIONS.**  
)  
)  
)

**ADDITIONAL EXHIBITS TO BE FILED  
ELECTRONICALLY AND NOW  
AVAILABLE, ON THE WEB, TO THE  
PUBLIC, GLOBALLY, AT LINKS  
ABOVE AND MIRROR SITES**

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## THE BIGGEST POLITICAL CORRUPTION CASE IN HISTORY!

What would make a lawsuit "*The Biggest Political Corruption Case In History?*"

It would rope in two Presidents of the United States, their staff, their covert political financiers, global energy and internet markets and dangle a few murders and hookers to boot!

It would affect nearly a TRILLION dollars of political cronyism, get people killed for talking about it, determine the fate of over 80% of the federal treasury for one, or another, group of insiders and change American history; when all of the facts are exposed!

That might do it.

In fact a suite of such lawsuits have already been filed in Washington DC, San Francisco Superior Court, Federal Northern District Court and other Courts. Plaintiffs already won one of them. They have case numbers, FBI agents on speed-dial, Inspector General files and whistle-blowers "out-the-ying-yang".

Why haven't you heard about these lawsuits? Because White House and Court officials have issued orders to the "main stream" news media to hide any stories about the matters. Court officials have been ordered to delay, defer, obfuscate, blockade and keep these cases "under wraps". Of course such orders are a FELONY violation of the law and the Plaintiffs human rights. Such obfuscation orders, by public officials, are a Constitutional violation of the law and proof that the very political corruption being alleged is fully underway.

Plaintiffs have now contacted every known intelligence agency, law enforcement agency, regulatory agency, inspector general and government attorney known to mankind. Every one of

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1 them points the finger to another agency and says "this is their problem..". The entire government  
2 law enforcement process now seems to be based on finger-pointing, stone-walling and defering to  
3 someone else!

4  
5 The amount of money, in damages, being sought by the Plaintiffs are relatively small.  
6 Google and government officials make that much in a few hours each day. The dollar amount is no  
7 skin off the Defendants backs.

8 The Team doing the suing knew, from the Watergate and other scandals, that huge cover-  
9 ups take place over huge scandals. They got their ducks in line, for these cover-up tactics, long ago.

10  
11 They arranged to hide all of the evidence and lawsuit materials **in plain sight** in front of all  
12 8 billion citizens on Earth.

13  
14 They uploaded one set of the encrypted evidence files to satellite SSD's already circling the  
15 Earth, to be downloaded on command. Plaintiffs refused to confirm or deny that they had even  
16 installed copies on Elon Musk's own satellites. While you might think that satellites are secure, you  
17 might have noticed that a group of 20 year old hacker's just hacked into all of Russia's spy satellites,  
18 the most massively defended space technologies in history, during the Ukraine war... so much for  
19 satellite security...

20 Plaintiffs also emailed encrypted file sets to every investigative reporting outlet from  
21 ICIJ.ORG, to wikileaks to NY Times to you name it. Those files will open globally with a single  
22 web command.

23  
24 Plaintiffs also posted all of the files on every server in the world, on free public space, that  
25 their bots found, as "torrent" files that appear to be movies. They are not movies, though. On  
26 command, the torrent slices assemble themselves back into the evidence files for anyone on Earth to  
27 call together via simple internet "drawstring" download command. Plaintiffs have offered the  
28 evidence files to anyone to post anywhere. The shame factor, if the entire file sets are released, will

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1 make history. None of the evidence was acquired illegally and it is 100% legal to publicly report  
2 crimes, corruption and illicit deeds.

3  
4 So much for the cover-up! The "insurance" plan for the Plaintiffs have already been  
5 distributed around the globe. There is no entity on the planet that can now find and delete it all.

6 So if the Plaintiffs are killed, Seth Rich-like: Everything opens up for the whole world to  
7 see.

8  
9 If the Plaintiffs get pissed off enough: Everything opens up for the whole world to see.

10 Russia just got a taste of what that might be like when a certain spy agency leaked 800GB of  
11 secret Moscow files and got spy bosses and their hookers, yachts, jet planes and lives messed up.

12  
13 Information is truly power!

14 What would an America be like that could no longer run it's government like a garage sale?  
15 Better!

16  
17 What would an America be like that no longer had it's White House controlled by insane  
18 billionaires like Musk, Page and Schmidt? Better!

19  
20 What would happen if every citizen saw the results of a cross database cull from the  
21 XKEYSCORE, FINCEN, SEC, ICIJ, IRS and GLX searches on every rich family in Washington  
22 DC and Silicon Valley? CHANGE!

23 Thus the lawsuits were put forward, on behalf of the American public through an example  
24 Plaintiffs filing of a civil complaint against Defendants, a representative entity which has a  
25 command-and-control, financing and management influence over it's own deep state sub-group, an  
26 agency operation of Defendant, known, in the media, as '*The Silicon Valley Oligarchs*', AKA, '*The*  
27 '*Paypal Mafia*', AKA '*The NVCA Blacklisting Group*', AKA '*The Deep State*', and alleges as  
28 follows, based on law enforcement agency evidence and eye-witness experience. This report, that

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1 you are reading, has now been filed with every law enforcement agency, regulatory agency,  
2 Inspector General, Attorney General, news organization and community group in America and  
3 Europe.

4  
5 The cover-ups and finger-pointing from one agency-to-another is endless.

6 Political operative/lobbyists like David Plouffe, Steve Westly, Jay Carney, Steve Spinner,  
7 John Podesta, David Axelrod spend their days running between rich people like Elon Musk, Eric  
8 Schmidt, Laurene Jobs, et al, convincing them that they must control public discourse and media,  
9 energy policy and most politics. These political operatives rake in a skim of 10%, or more, of the  
10 cash they can guilt trip the oligarchs into barfing into the operatives thousands of shell corporations,  
11 fake charities and “social trusts”. They use the same social engineering tricks that the Nazi’s, the  
12 CIA and Chinese secret police use to start, or block, social revolutions: ***Contrived emotional trigger***  
13 ***facades that sucker in the oligarchs.***

14 The best way to separate a stupid rich person from their money is to make the oligarch  
15 believe they are fighting a fake war against the “satanic forces” of the opposing political party.

16  
17 **DURHAM CRACKED THE SEAL**

18 THE DURHAM INVESTIGATIONS TEAM HAVE ***MUCH MORE*** IN HAND THAN  
19 THE GENERAL PUBLIC HAS HEARD ABOUT:  
20  
21  
22  
23  
24  
25  
26  
27  
28

# Afghanistan: The Saudi Arabia of Lithium?

**Lithium, which is from mobile phone nation's economy.**

By JAMES RISEN

Published: June 13, 2010

WASHINGTON — The United States has discovered nearly \$1 trillion in untapped mineral deposits in [Afghanistan](#), far beyond any previously known reserves and enough to fundamentally alter the

As of late February held Ener1 Group.

loan to Think Global, which is trying to emerge from bankruptcy — is held by Bzinfon, a British Virgin Islands company whose "indirect beneficial owner" is Boris Zingarevich, a Russian businessman. Zingarevich has close ties to Russian President Dmitry Medvedev and Prime Minister Vladimir Putin.

## Investing in Lithium Mining Stocks

**Green power corrupts**

### How To Profit from the Lithium Boom

By Brian Hicks

Friday, October 16th, 2009

Editor's Note:

While Western Lithium remains trades — and possibly a third — opportunity to double if not trip

## Goldman Sachs culture 'toxic'? Letter confirms suspicions about Wall Street.

A123 lithium-ion battery maker bankruptcy fuels criticism of President Barack Obama's alternative

Energy & Genius

### The Saudi Arabia of Lithium

Brendan I. Koerner, 10.30.08, 06:00 PM EST

Forbes Magazine dated November 24, 2008

The gas engine made petroleum the world's biggest commodity. The electric car could do the same for the third element on the

### Ener1 Wants to Win Lithium Ion Battery Race

U.S. Identifies Vast Mineral Riches in Afghanistan

## The problem with lithium

David Booth, National Post

N chloride ring SQM creating the illusion the ultra-arid sala

Image: CarSpace

Lithium ion battery manufacturer Ener1 (HEV) could become the country's first lithium ion bat mass producer—if it wins a \$480M Department of Energy loan. [CNNMoney](#) has more:

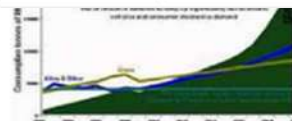
ENERGY + GENIUS  
CLICK HERE FOR FULL COVERAGE

portion of Potash's interest in taking over SQM. The Chilean company gets 58% of its revenue from fertilizers, compared to 11% from lithium. But it's clear that investors are intrigued by SQM's rapidly expanding operations in the Atacama desert. Chile boasts at least ten more salars that have yet to be explored for lithium reserves. If GM is right and drivers are willing to pay a steep premium for lithium-powered cars, SQM could be poised for a windfall.

**RUSSIAN OWNED**

Goldman Sachs discloses ownership in Talison Lithium Corp.

Talison Lithium Ltd's



We have another report on Energy Storage space which provides a view from Goldman Sachs on the sector this time. In Lithium space we have our own fast developing story, when Japanese Trading Houses are in a rush to secure Lithium supply.

"Asian lithium rush continues. One more factor in Lithium is gone from the market for potential deals. We were not following geothermal as source of lithium in

- [Durham Probe: Judge Denies Sussmann Motion To Dismiss Case; Trial To Begin](#)

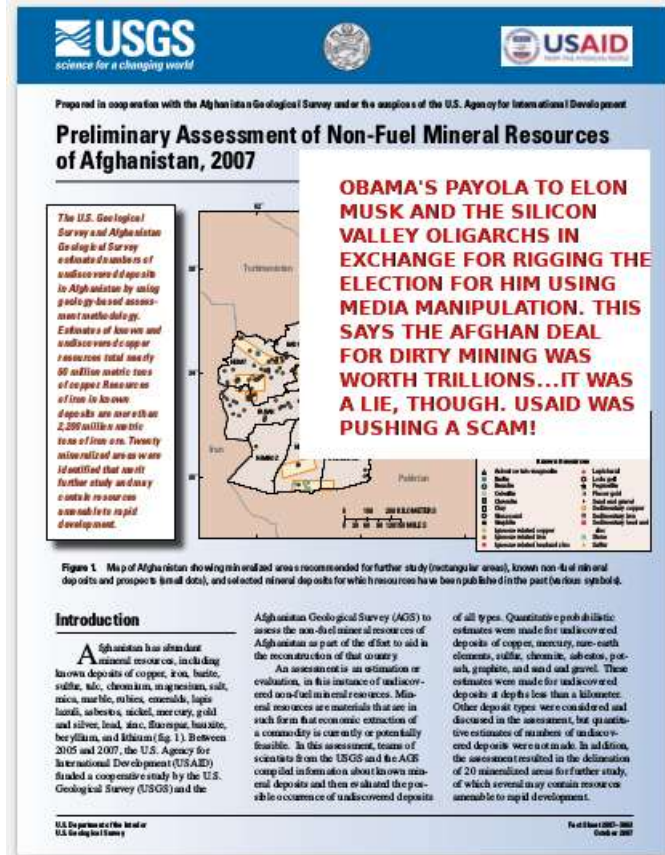
[Next Month](#)



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“Uranium  
One“, “Afghanistan  
Lithium“, “Congo  
Cobalt“, “Rare Earth  
Scam Blood Minerals”  
are phrases that have  
been in the news lately.  
They all involve  
corruption, at the  
highest level, and THE  
SAME SET OF  
LAWYERS,  
POLITICOS and  
OLIGARCHS! (ie: a

“CARTEL”, also known in legal terms as a “RICO confirming ‘enterprise’) These insiders have set  
out to stock market manipulate many TRILLIONS of dollars of mining deals for THEMSELVES at  
the expense of U.S. taxpayers and on the backs of indigenous peoples! Energy isn’t “**Green**” if you  
are **killing Black and brown people** to get it!



**ELON MUSK'S CHILD LABOR CAMPS TO MINE HIS LITHIUM AND COBALT RARE EARTH**

**ELON MUSK'S SHAME**

**LITHIUM MINES & FACTORIES POISON WORKERS**

Inside the Congo mines that exploit children

**ELON MUSK'S "BLOOD MINERAL" CHILD LABOR CAMPS**

YOUR SKIN WHEN A LITHIUM ION BATTERY GOES OFF IN YOUR PANTS

ANOTHER TYPICAL LITHIUM ION BATTERY EXPLOSION

**ELON MUSK'S "BLOOD MINERAL" CHILD LABOR CAMPS**

**ELON MUSK'S "BLOOD MINERAL" CHILD LABOR CAMPS**

**ELON MUSK'S "BLOOD MINERAL" CHILD LABOR CAMPS**

**Mines Linked to Child Labor Are Thriving in Rush for Car Batteries**

**ELON MUSK'S CONGO BLOOD MINERALS**

**I WAS KILLED BY ELON MUSK'S DEADLY LITHIUM ION BATTERIES. I WAS BURNED ALIVE. THANKS ELON!**

**Elon Musk's Congo Child Labor Cobalt Mines Have Caused Millions To Flee Bloodshed As Congo Falls Apart From Musk's Corruption**

**THE LITHIUM ION CORRUPT MINING STOCK MARKET SCAM**

SILICON VALLEY VC CAMPAIGN BACKERS

Google

Greylock

Kleiner Perkins

Vantage Point

Draper Fisher

Khosla Ventures

Firelake

CBRE

Westley Group

etc.....

WHITE HOUSE & CORRUPT SENATORS

1 Owned Users & Buyers of Lithium Ion batteries

2 Afghanistan Mineral Mining For Lithium & Solyndra Materials

3 Paid for Obama's, Reid's & Feinstein's Political Campaigns in Exchange For Policy Decisions

**Energizer**

ULTIMATE

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## TESLA IS A "DEATH CAR"

Father of Tesla driver: 'Had she been in another vehicle she would have been alive'

Indianapolis Star

Tesla itself was the target of a National Highway Transportation Safety Agency investigation after a series of battery fires in 2013 Model S vehicles.

Father of Tesla driver: 'Had she been in another vehicle she would have been alive'

Energy & Genius

### The Saudi Arabia of Lithium

Brendan I. Koerner, 10.30.08, 06:00 PM EST  
Forbes Magazine dated November 24, 2008

The gas engine made petroleum the world's biggest commodity. The electric car could do the same for the third element on the periodic table.



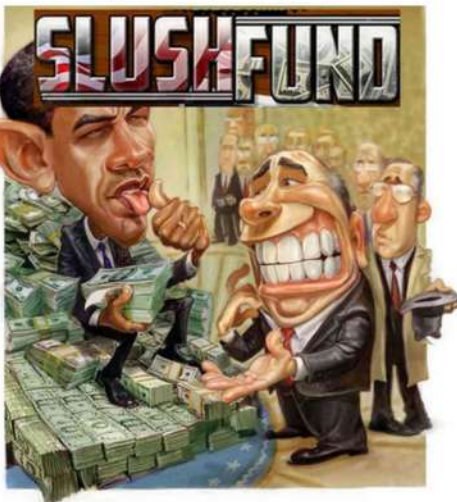
60 Shiga Shiges / AP/Wide World / Redux / AP Images  
Mounds of magnesium chloride ring SQM's mine, creating the illusion of snow in the ultra-arid salar.

The gas engine made petroleum the world's biggest commodity. The electric car could do the same for the third element on the periodic table.

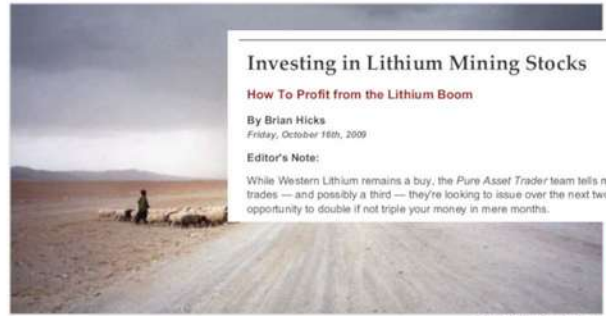
Nothing grows in the heart of the Salar de Atacama, this ancient Chilean lake bed 700 miles north of Santiago may be the driest place on Earth, a wasteland



This is the Tesla battery inside the MILITARY-GRADE BLAST CHAMBER that it must be used in at the Tesla Factory because of the EXTREME EXPLOSION DANGER of the Tesla Battery



## U.S. Identifies Vast Mineral Riches in Afghanistan



### Investing in Lithium Mining Stocks

How To Profit from the Lithium Boom

By Brian Hicks

Friday, October 16th, 2009

Editor's Note:

While Western Lithium remains a buy, the Pure Asset Trader team tells me it trades — and possibly a third — they're looking to issue over the next two weeks opportunity to double if not triple your money in mere months.

A stark Ghazni Province seems to offer little, but a Pentagon study says it may have among the world's largest deposits of lithium.

By JAMES ROSEN  
Published June 13, 2010

WASHINGTON — The United States has discovered nearly \$1 trillion in untapped mineral deposits in Afghanistan, far beyond any previously known reserves and enough to fundamentally alter the Afghan economy and perhaps the Afghan war itself, according to

RECOMMEND

TWITTER

COMMENTS

(1450)

Discovera Story > Earth Story > Afghanistan: The Saudi Arabia of Lithium?

### Afghanistan: The Saudi Arabia of Lithium?

Lithium, which is used to make batteries for everything from mobile phones to iPads, could transform the war-torn nation's economy.

Mon Jun 14, 2010 12:25 PM ET  
Content provided by Wahedullah Masoud, AFP

MINING.com  
\$1 Trillion  
Motherlode of  
Lithium and Gold  
Discovered in  
Afghanistan |  
MINING.com



THE LITHIUM ION BATTERY  
DANGER COVER-UP

NATIONAL POST

Friday, May 1, 2009

## The problem with lithium

Iaivid Booth, National Post



Pierre Verdy, AFP, Getty Images

How quickly we have forgotten. Yesterday's front-page headline is today's page 13 filler, consigned to the back of the newspaper as something sexier or more pressing forces its way to page one--above the fold.

The subject I'm talking about is oil, the pressing story before all the world's stock markets decided to simultaneously implode. We used to worry about the price of oil and when it would run out, and even

on-petrochemical engineers understood the concept of "peak oil." But, whether alternative energy is still big news or not, this much is clear: The world's oil supply is finite, fossil-fuelled vehicles pollute and the public outcry for an alternative is strong.

The leading alternative right now -- if you judge technology by the amount of press generated -- is electric cars. Electric cars don't pollute, electrons are relatively cheap and, perhaps most importantly, these vehicles seem to have captured the imagination of the American consumer, still the greatest economic engine in the world.

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THE STOCK MARKET SCAM USING ENERGY AND BIG TECH STOCKS TO PAY  
BRIBES:

The SEC said:

*“Thank you for contacting the U.S. Securities and Exchange Commission (SEC) Office of Inspector General (OIG). We received your email. We will evaluate the information provided and take appropriate action. Options include opening an OIG review; referring the matter to a SEC Division or Office for review, if warranted; or taking no action (allegations that do not involve a potential violation of law, rule, regulation, or policy as well as allegations with limited specificity or merit may be closed with no further action). In this regard, please note the following:*

- The OIG is an independent office within the SEC that primarily audits internal SEC operations and investigates alleged SEC staff misconduct. The OIG derives its authority from the Inspector General Act of 1978, as amended. In accordance with that statute, the OIG cannot perform SEC operating responsibilities, such as investigation of alleged securities law violations.*

- The OIG only has the authority to address allegations or complaints that relate to SEC programs, operations, and personnel.*

- The OIG has no authority to direct the SEC to take action with regard to SEC operations, such as (1) change its policies, (2) commence or conclude any particular investigation, (3) implement new securities rules for market participants, or (4) initiate administrative disciplinary action.*

- Due to privacy interests we do not provide complainants with updates on, or the results of, a complaint or investigative matter.*

- General questions about the Federal securities laws can be directed to the SEC’s Office of Investor Education and Advocacy at [sec.gov/oiea/QuestionsAndComments.html](https://sec.gov/oiea/QuestionsAndComments.html), [help@sec.gov](mailto:help@sec.gov) or 202-551-6500 or 1-800-732-0330.*

- Allegations of Federal securities law violations should be reported using the online Web form located at [sec.gov/tcr](https://sec.gov/tcr). Tips, Complaints, and Referral Filing Guidance is available at [www.sec.gov/complaint/info](https://www.sec.gov/complaint/info). SEC investigations are conducted confidentially. As a result, the SEC generally will not confirm or deny the existence of an investigation unless and until it becomes a matter of public record. [www.sec.gov/answers/investg.htm](https://www.sec.gov/answers/investg.htm).*

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Respectfully,

The Office of Inspector General

U.S. Securities and Exchange Commission

100 F Street, NE, Washington, DC 20549-2977

[oig@sec.gov](mailto:oig@sec.gov)

**Sent:** Tuesday, April 12, 2022 3:15 PM

**To:** OIG <OIG@SEC.GOV>

**Cc:** KGimre@perkinscoie.com

**Subject:** Fwd: LITHIUM ION BATTERIES”

If your complaint relates to alleged SEC employee misconduct, please provide specific information or evidence to the OIG as follows:

(1) the identity of the employee(s) involved; **## SEC employees and contractors at SEC from 2007 to today who read the newspapers or the common news stories about the Silicon Valley and energy industries scandals and who held stock, or future jobs with the charged perpetrators**

(2) the approximate date of the alleged misconduct; **## From Aug. 15, 2007 to today**

(3) the specific nature of the alleged misconduct; **## In exchange for bribes SEC employees avoided investigations of Google, Facebook, Tesla and other members of a Cartel-based RICO-violating Big Tech 'Enterprise'.**

(4) the rules, regulations, or statutes that you allege the employee violated; **## ALL rules, regulations, or statutes relative to the exchange for bribes SEC employees avoided investigations of Google, Facebook, Tesla and other members of a Cartel-based RICO-violating Big Tech 'Enterprise'.**



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(5) the identity of other persons who might be aware of this alleged misconduct; **## White House staff during this period, Washington Post and CBS news investigators, ourselves and FINCEN.**

(6) the basis for your knowledge of the alleged misconduct; **## First hand knowledge**

(7) any documentary evidence of the alleged misconduct; and **## See the EVIDENCE AND WEB REPOSITORY links in the attached DISCLOSURE DOCUMENT**

(8) a statement regarding whether you (a) request confidentiality or (b) waive confidentiality (your name may be released to non-OIG personnel if an investigation is needed). **## Our confidentiality and protection per ongoing attacks and death threats, is requested**

-----

**PERKINS COIE NEEDS AN FBI RAID OF ALL OF THEIR FILES SINCE 2007:**

The Durham investigation, and a regular FBI investigation, should harvest EVERY file at Perkins Coie! Why are Perkins Coie and Goldman Sachs behind almost every one of these dirty deals?

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[Home](#) > [News & Insight](#) > [Biden Administration Secures Supply Chains of Strategic and Critical Minerals for Clean Energy Economy](#)
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## Biden Administration Secures Supply Chains of Strategic and Critical Minerals for Clean Energy Economy

04.11.2022 | [UPDATES](#)

President Biden, on March 31, 2022, invoked the Defense Production Act to secure reliable supply chains for minerals essential to a clean energy transition, including lithium, nickel, cobalt, graphite, and manganese. These minerals are required for the production of large-capacity batteries. The memorandum for the secretary of defense found that a consistent and sustainable supply chain for these minerals was "essential" to the national defense and cited the need "to rebuild and maintain American expertise and productive capacity in these critical sectors." President Biden further noted that "action to expand the domestic production capabilities for such strategic and critical materials is necessary to avert an industrial resource or critical technology item shortfall," directing the secretary of defense to "create, maintain, protect, expand, or restore" domestic production.

### Recent World Events Exacerbated Supply Chain Disruptions

Since Russia's invasion of Ukraine, the price of metals has skyrocketed as uncertainty looms over sanctions and impacts to the supply chain. For instance, the price of nickel, which is key for electric vehicle batteries, has risen 9% this year, and the price of palladium, used in catalytic converters and semiconductors, is up 73%. Prices have increased because many of the raw materials used in commerce are produced in Russia, Ukraine, or other areas affected by the conflict. One Russian company alone is responsible for 5% of the world's annual production of nickel, and 40% of the world's annual production of palladium. In response to the invasion, many companies are trying to diversify their sourcing away from Russian producers. But giving up the Russian supply of raw materials requires sufficient production from other sources to replace it. Not coincidentally, the administration has recently stepped up its efforts to secure the supply chain, announcing a plan in February 2022 to "Revitalize American Manufacturing and Secure Critical Supply Chains in 2022."

The concern over the supply chain is not new. In 2017, the Trump administration expressed concern over the supply chains for critical minerals, and issued Executive Order 13817, requiring that the secretary of the interior identify critical minerals and making it a policy of the federal government to "reduce the Nation's vulnerability to disruptions in the supply of critical minerals." The order also defined "critical minerals" as those minerals the secretary identifies as "(i) a non-fuel mineral or mineral material essential to the economic and national security of the United States, (ii) the supply chain of which is vulnerable to disruption, and (iii) that serves an essential function in the manufacturing of a product, the absence of which would have significant consequences for our economy or our national security." In September of 2020, during the height of the COVID-19 pandemic and peak

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### Related Services

#### PRACTICES

- Infrastructure Development
- Environment & Natural Resources

#### INDUSTRIES

- Clean Technology
- Mining
- Energy Law

**Figure 1: PERKINS COIE RUNS 'HIT-JOBS' AGAINST COMPETITORS TO THE FINANCIER-BENEFICIARIES OF OBAMA-BIDEN FINANCIERS – THIS REPORT IS A STOCK MARKET PUMP-AND-DUMP MARKET MANIPULATION SCAM!**

The lawyers and their clients at Perkins Coie own these corrupt mining operations AND Tesla, Fisker and the corrupt companies that exploit them. Look at this BS hype that they pump out to push their scam:

[Biden Administration Secures Supply Chains of Strategic and Critical Minerals for Clean](#)

...

Perkins Coie

... \$17 billion in loan authority in the **Advanced Technology Vehicles Manufacturing Loan Program** to support the domestic battery supply chain, ...

1           **PERKINS LIES AND HYPE TO PUSH THEIR MINING SCAM WHILE THEIR**  
2 **TOP LAWYER (SUSSMAN) IS UNDER FEDERAL INVESTIGATION FOR SCAMS AND**  
3 **HIT-JOBS THEY PUT ON REPORTERS, COMPETITORS AND WHISTLE-BLOWERS:**

4  
5           IF PERKINS COIE HAD DONE EVEN A CHILD’S LEVEL OF RESEARCH, THEY  
6 WOULD HAVE FOUND THESE FACTS:

7           [AFGHAN LITHIUM WAR PROFITEERING – SILICON VALLEY RARE EARTH](#)  
8 [MINING SCAM – OBAMA AND MUSK RARE EARTH MINING SCAM](#)

9  
10          [AFGHAN LITHIUM SCAM LITHIUM ION BATTERIES BLOW UP – OBAMA AND](#)  
11 [MUSK RARE EARTH MINING SCAM](#)

12  
13          [AFGHAN LITHIUM SCAM AN OPEN LETTER TO TESLA MOTORS – OBAMA](#)  
14 [AND MUSK RARE EARTH MINING SCAM](#)

15  
16          [afghan mining scam – SILICON VALLEY RARE EARTH MINING SCAM](#)

17  
18          [RARE EARTH METALS ARE A FAILED INDUSTRY](#)

19  
20          There is not even remotely enough rare earth metal on Earth to meet the demand and the  
21 little that there is lies in China and other nations that hate the U.S. and require an invasion to  
22 acquire! These idiots have based their plan on mining unknown asteroids that “**MIGHT**” have  
23 metals on them... but nobody knows. The little bits of rare earth metals, that they get now, on Earth,  
24 use child labor, rape and genocide to run their mining camps! Honda and Toyota have solved the  
25 problem with hydrogen fuel cells but the U.S. Big Tech hates hydrogen because it has no safety,  
26 cultural or toxicity issues and obsoletes Big Tech’s scheme! Musk and his big tech Cartel spend a  
27 billion dollars a year on PR hype to nay-say hydrogen but Toyota and Honda fuel cell cars keep  
28 speeding along without a single problem while Musk’s cars are always blowing up and burning

1 their owners alive!

2 ....BUT THEY DON'T WANT ANYBODY TO KNOW THE FACTS. THEY JUST  
3 WANT TO PROTECT THE BIGGEST MINING AND RARE EARTH MINERAL SCAM IN  
4 HISTORY!!! ....BECAUSE THEY ARE ELON MUSK'S, LARRY PAGE'S AND ERIC  
5 SCHMIDT'S BITCHES! "FOLLOW THE MONEY..." Says **FinCEN**

6 [LEAK: America's Highest Earners Secret IRS Files Revealed...](#)

7 [Billionaire Accused of Evasion Claims 'Accelerated' Dementia...](#)

8  
9  
10 [Rare Earth — The CIA's Secret Genocide](#)

11 [✖https://nebula.app/videos/rareearth-the-cias-secret-genocide](https://nebula.app/videos/rareearth-the-cias-secret-genocide)

12  
13 [Rare-earth element – Wikipedia](#)

14 [✎https://en.wikipedia.org/wiki/Rare-earth\\_element](https://en.wikipedia.org/wiki/Rare-earth_element)

15 The **rare-earth** elements (REE), also called the **rare-earth** metals or (in context) **rare-**  
16 **earth** oxides, or the lanthanides (though yttrium and scandium are usually included as **rare-earths**)  
17 are a set of 17 nearly-indistinguishable lustrous silvery-white soft heavy metals. Scandium and  
18 yttrium are considered **rare-earth** elements because they tend to occur in the same ore deposits as  
19 the lanthanides ...

20 [EQT, ElementUS may build rare-earth refinery here – Pittsburgh Business Times](#)

21 [🖼️https://www.bizjournals.com/pittsburgh/news/2022/04/13/rare-earth-minerals-eqt-](https://www.bizjournals.com/pittsburgh/news/2022/04/13/rare-earth-minerals-eqt-elementus.html)  
22 [elementus.html](https://www.bizjournals.com/pittsburgh/news/2022/04/13/rare-earth-minerals-eqt-elementus.html)

23 **Rare-earth** elements are found in nature and are critical components of high tech devices,  
24 but since the early 1990s have been overwhelmingly produced in China.

25 [Rare earth element mineral deposits in the United States](#)

26 [📄https://pubs.er.usgs.gov/publication/cir1454](https://pubs.er.usgs.gov/publication/cir1454)

27 The **rare earth** elements have become vital to manufacturing numerous high-tech products,  
28 which has been accompanied by a large increase in their demand. At the same time, there has been

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1 concern by the United States and many other Nations about the near-monopoly of mining,  
2 processing, and supply of REEs from one Nation, China.

3 [The new US plan to rival China's dominance in rare earth metals – CNBC](#)

4 [https://www.cnbc.com › 2021 › 04 › 17 › the-new-us-plan-to-rival-chinas-dominance-in-](https://www.cnbc.com › 2021 › 04 › 17 › the-new-us-plan-to-rival-chinas-dominance-in-rare-earth-metals.html)  
5 [rare-earth-metals.html](https://www.cnbc.com › 2021 › 04 › 17 › the-new-us-plan-to-rival-chinas-dominance-in-rare-earth-metals.html)

6 Apr 17, 2021 In 2019, China was responsible for 80% of **rare earths** imports, according to  
7 the U.S. Geological Survey, although exports fell last year in part due to Covid-19. **Rare earths**  
8 elements are more ...

9 [Trump executive order targets rare earths minerals and China](#)

10 [https://www.defensenews.com › congress › 2020 › 10 › 01 › trump-executive-order-on-](https://www.defensenews.com › congress › 2020 › 10 › 01 › trump-executive-order-on-rare-earths-puts-material-risk-in-spotlight)  
11 [rare-earths-puts-material-risk-in-spotlight](https://www.defensenews.com › congress › 2020 › 10 › 01 › trump-executive-order-on-rare-earths-puts-material-risk-in-spotlight)

12 **Rare earth** elements are a group of 17 **minerals** critical to the defense industry's  
13 manufacturing of missiles and munitions, hypersonic weapons, and radiation-hardened electronics  
14 — as well as ...

15  
16  
17  
18 [More Images](#)

19 [U.S. Deposits of Rare-Earth Elements Are . . . Not So Rare ... – National Review](#)

20 [https://www.nationalreview.com › corner › u-s-deposits-of-rare-earth-elements-are-not-so-](https://www.nationalreview.com › corner › u-s-deposits-of-rare-earth-elements-are-not-so-rare-after-all)  
21 [rare-after-all](https://www.nationalreview.com › corner › u-s-deposits-of-rare-earth-elements-are-not-so-rare-after-all)

22 Right now, the only U.S. domestic source of **rare-earth minerals** is the Mountain Pass  
23 mine in California. As I noted back in December, the United States is sitting on a massive supply of  
24 **rare-earth** ...

25 [Rare-earth mineral – Wikipedia](#)

26 [https://en.wikipedia.org › wiki › Rare-earth mineral](https://en.wikipedia.org › wiki › Rare-earth_mineral)

27 A **rare-earth mineral** contains one or more **rare-earth** elements as major metal  
28 constituents. **Rare-earth minerals** are usually found in association with alkaline to peralkaline



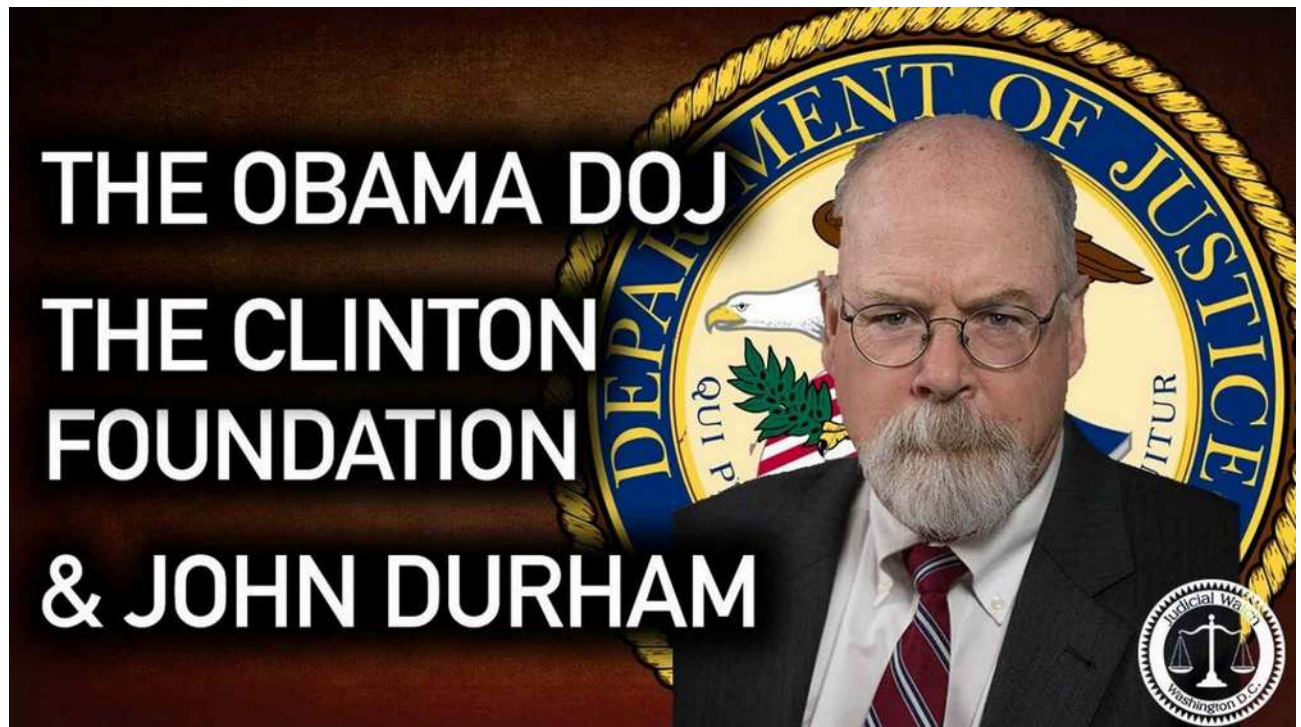
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igneous complexes, in pegmatites associated with alkaline magmas and in or associated with carbonatite intrusives. Perovskite **mineral** phases are common hosts to **rare-earth** elements within the alkaline complexes.

[USA Rare Earth to produce nearly half of critical minerals in USGS' updated ...](#)

<https://www.mining.com › usa-rare-earth-to-produce-nearly-half-of-critical-minerals-in-usgs-updated-list>

USA **Rare Earth** announced that it expects to produce nearly half of the critical **minerals** listed in the US Geological Survey's revised list of raw materials deemed crucial for national security ...



## REGIONS AFFECTED

1  
2  
3  
4  
5 1. Defendants resided and /or transacted business in the relevant counties which are  
6 within the authority of the Courts. Defendants operated their scams in America, Bolivia, China,  
7 Afghanistan, The Congo and other foreign regions, thus, international Courts and investigative  
8 inquiries are also applicable. For example, The Hunter Biden hard drives reveal a deep Chinese and  
9 Ukrainian scam, for Cobalt and Lithium that runs cross-border. Matters were conducted in  
10 California, Michigan, Texas, Washington, DC and other domestic regions.

11 2. Plaintiffs have been blockaded from suing other affiliated insiders due to threats  
12 from affiliated insiders, previous attacks by affiliated insiders, blockaded lack of legal  
13 representation, lack of funds and the administrative limits of a single individual engaging in battle  
14 with trillions of dollars of hostile and corrupt entities at the same time.

15 3. Federal law enforcement and regulatory officials shall testify in this trial to assist in  
16 the correct identification of the DOE and ROE co-conspirators, thought to be the officers,  
17 executives and investors involved in VALIC/AIG, Tesla Motors, In-Q-Tel, Facebook, SpaceX,  
18 Google, Alphabet, YouTube, Instagram, Netflix, Linkedin or related NASDAQ 'FANG' stocks and  
19 they shall disclose leaked information about the family financial records and relationships of those  
20 parties. UNITED STATES OF AMERICA, via it's employees, contractors and all of it's hired  
21 politicians, Congress-people and agency staff own the stocks of the stated corrupt companies and  
22 provide command-and-control and a favored-nations status beneficiary sets of perks and favors to  
23 those companies as well as a damaging set of harms to the competitors of those companies, such as  
24 Plaintiffs. Conspirators shall be called to testify, at trial, wherein they will claim to not be part of  
25 **UNITED STATES OF AMERICA** and it's government, yet Plaintiffs will prove that they indeed,  
26 covertly, actually are, and they are a very large part of it.

27 4. This complaint covers issues which the Court has the power to decide, such as  
28 RICO, Anti-trust monopoly violations, 28 U.S.C. &1331; 18 U.S.C. §§ 1961(5), 1962(c), 18 U.S.C.

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§§ 1961(5), 1962(d) 773. ; and many other matters which attorney-less, pro-se, low-income, senior, disabled Plaintiffs are not skilled enough to properly cite, at this time, but could cite, with perfection, with a great court-appointed lawyer. Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331, as Plaintiffs claims arise under the Constitution and laws of the United States. This Court has jurisdiction to grant relief in this action pursuant to 28 U.S.C. § 1346(b), as Plaintiffs brings claims under the Federal Tort Claims Act. This case also presents a federal matter within this Court’s jurisdiction under Article III of the United States Constitution, 28 U.S.C. § 1331, and the Administrative Procedure Act, 5 U.S.C. § 702, and under other related law acts and precedents.

This Court has authority to grant declaratory relief under the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and to award damages, costs, and attorneys’ fees under 28 U.S.C. § 2412, and under other related acts and precedents. Venue is proper in this district under 28 U.S.C. § 1391(e), and under other related acts and precedents. The venue is proper in this district pursuant to 28 U.S.C. § 1391(b), because a substantial part of the acts or omissions that give rise to the Plaintiffs’ claim occurred or will occur in the area. RICO charges by Plaintiffs, against Defendant are verified as valid by Plaintiffs and by reviewing third parties. Plaintiffs are also requesting relief under the United States Constitution, the Federal Tort Claims Act (“FTCA”), 28 U.S.C. §§ 1346(b), 2672 and related jurisdictions and applicable rights.

## PARTICIPANTS

5. At all times relevant herein, Plaintiffs, (hereafter “Plaintiffs”) was, and are, native born American citizens. Plaintiffs income, housing, brand and businesses were attacked and cut-off in reprisal for their aid to the government in criminal ‘*stimulus*’ scam investigations involving profiteering with the Afghanistan war, the energy industry and the stock market. Defendants spent over \$60 million dollars (proven by their own banking records and opposition research group’s past billings) using spy agency-type dirty tricks to harm Plaintiffs as revenge/vendetta/reprisal because Plaintiffs testimony and case-support terminated so many of Defendants corruption-based crimes,

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1 payola, bribes and illicit profiteering loopholes.

2  
3 6. On information and belief, always relevant herein, the **UNITED STATES OF**  
4 **AMERICA government officials and their covert business partners**, which includes those  
5 entities that are financier/beneficiary oligarchs and tech companies and is, a USA and California  
6 governmental entity, doing business in the State of California, both, legitimately, and, covertly with  
7 an organized crime ‘enterprise’ operating within our Government that makes over a trillion dollars  
8 a day in revenue, as reported in SEC, OPM and Budget agencies, partially derived from **Plaintiffs**  
9 **patents, research work, trade secrets and past work which UNITED STATES OF AMERICA**  
10 **owes Plaintiffs money for**. The co-conspirators agency is known as ‘The Silicon Valley Oligarchs’,  
11 ‘The Paypal Mafia’ and/or ‘The NVCA Blacklisting Alliance’ ( sometimes referred to by the press as  
12 ‘The Deep State’) (“The Deep State” is defined as “A non-governmental body of conspirators who  
13 manipulate the official government” ) , and will be identified by name by federal officers during  
14 Trial before a Jury. They include a cartel-based set of the same team of investment bankers, CPA’s  
15 (think PANAMA PAPERS), lobbyists, middlemen, crooked law firms, government officials and  
16 hit-jobbers that keep the whole scam going year-after-year as an ‘enterprise’ as defined under  
17 RICO.

18 7. The U.S. has sued the portion of itself that is known as “the deep state”, in particular  
19 in the “[SILICON VALLEY NO POACHING CLASS ACTION LAWSUIT](#)”, Case # **11-CV-2509**  
20 **and related cases** (Which proves, along with the [AngelGate Scandal](#), that the stated Defendants do  
21 conspire to manipulate the government and society), a lawsuit which Plaintiffs helped stimulate to  
22 fruition yet never received a dime of money from, yet. Many consider these tech insiders to be  
23 organized crime sub-Cartels under the the master RICO “Enterprise” which members of the U.S.  
24 government participate in. The U.S. government has many civil and criminal suits and a huge  
25 number of active investigations against their members. The most illicit specific names, as potential  
26 suspects, have always existed in the filed **EXHIBITS** with this complaint. There are, shockingly,  
27 large number of network TV shows and films on the air, today, about how sociopathic and law-  
28 breaking these people are. (Ie: **Billions; Uber; We Crashed; The Social Network; Silicon Valley;**

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1 ***Bad Blood – The Theranos Story; The Circle***, etc. ) In his Case # **1:12-CV-00774-mms**, and the  
 2 related case numbers, Plaintiffs and their peers, acting as agents of the public, and in the public-  
 3 interest, proved to Judge [Ketanji Brown Jackson](#), that government officials infected with corruption  
 4 harmed Plaintiffs in reprisal and he won his remand. As of today, the case issue of a Department of  
 5 Energy, EPA, SSA, HUD and other agencies infected with corruption has been reviewed in a record  
 6 volume of government hearings that validate Plaintiffs charges of a crony-based sub-government  
 7 operating within the main government. There can now be no argument that the U.S. government is  
 8 infected with corruption. It is proven that it is. There is a record amount of evidence documents in  
 9 those court records which Plaintiffs refers this Court to in addition to the new evidence provided  
 10 herein at the weblinks posted above. That case was presented by Plaintiffs on ***behalf of the public***  
 11 to expose political corruption. Plaintiffs was defrauded by the U.S. Government out of years of his  
 12 life and all of his life savings by the government lies that the process was fair. The world now  
 13 knows that the government decision process involved officials who hold stock, revolving door jobs,  
 14 and other payola in the “winners” and the agency funding decisions are entirely rigged and ‘*hard*  
 15 *wired*’ for the deciders personal friends and financiers. It was rigged for Elon Musk, by his  
 16 investors Dianne Feinstein and Nancy Pelosi and other government officials. Plaintiffs work with  
 17 the Department of Energy labs since 2000, and his tips led to the FBI raid of Solyndra and a huge  
 18 number of Federal investigations, his blood poisoning caused by the DOE lab work and other  
 19 related claims are raised in this litigation. Plaintiffs letter to Senator Bingham and the Energy and  
 20 Commerce Committee began the Solyndra and Cleantech Crash investigations as shown on the  
 21 referenced 60 MINUTES segments and other documents in the attached and linked **EXHIBITS**,  
 22 and created the ‘**The Stop Trading on Congressional Knowledge (STOCK) Act**’ which Senator  
 23 Bingham and Plaintiffs both aggressively pushed to create.

24 8. **To be clear: *The United States Government, through its employees and contractors, and***  
 25 ***via orders from White House and other senior officials, caused Google, Facebook, Tesla,***  
 26 ***Linkedin, YouTube, Kleiner Perkins and other Silicon Valley entities to covertly become part of***  
 27 ***the U.S. Government. They exchanged monies, through bank and wire transfers, surveilled***  
 28 ***citizens for the U.S. and with each other ran an illegal RICO-violating, stock market rigging, sex***



*trafficking, revolving door, payola-based “enterprise” and operated scams against Plaintiffs and the American Taxpayer causing massive harms to Plaintiffs, the American people and Democracy. This is revealed in the ICIJ.ORG leaks, Wikileaks, eyewitness experience and hundreds of other leaks, along with the evidence provided herein and at <https://san-francisco-news.com> and it’s many mirrored transparency site clones worldwide.*

9. For example, Google’s Eric Schmidt funded the US. Governments operations, funded the President’s election campaign, worked for U.S. military operations, coordinated the global manipulation of internet systems from the basement of the President’s campaign office during the elections, ran massive tax evasion ops, had a “sex penthouse” for himself and government officials (as is widely reported in the news) and “controlled the U.S. White House”. The United States of America was fully aware of all of Mr. Schmidt’s illicit, perverse and possibly criminal actions from 2006 forward through FBI, FTC, SEC, FINCEN, Interpol, CIA, NSA and other investigations yet he was protected from the law because he was “part of the government of The United States Of America”. That was a “false immunity” or “contrived immunity” which was not legally valid. Over 120 other tech oligarchs, listed in the attached EXHIBITS, became part of the UNITED STATES GOVERNMENT, committed heinous crimes, perversions, bribery, embezzlement and other horrors, yet were never prosecuted, on orders from the White House and Agency bosses because it would be “embarrassing”. Apparently, in 2022, it is “embarrassing” to allow the police to arrest the army of people gang robbing all of the drugstores or the oligarchs raping our Democracy in plain site. As recently as today, Hunter Biden’s multiple lost laptop computers have become the biggest joke in the world as it has now been revealed that Hunter Biden, just as with Eric Schmidt, Larry Page, Mark Zuckerberg, Elon Musk, et al, while not being an “official” part of the government ARE actually a covert part of the government. **The Google billionaire that has people “killed” runs the Obama and Biden White House.** Eric Schmidt has long sought influence over U.S. science policy. Under Biden’s former science chief, Eric Lander, Schmidt’s foundation helped cover officials’ salaries, even as the office’s general counsel

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1 raised ethical flags. In an investigation by Politico and [Alex Thompson](#) it was just  
2 revealed that As President Joe Biden granted his science office unprecedented access and  
3 power, one outside adviser to that office has attained what staffers describe as an unusual  
4 level of influence.

5 A foundation controlled by Eric Schmidt, the multi-billionaire former CEO of Google, has  
6 played an extraordinary, albeit private, role in shaping the White House Office of Science and  
7 Technology Policy over the past year.

## REVEALED: Google billionaire Eric Schmidt PAID the salaries of staff inside Biden's science office and has been quietly lobbying on policy since Obama administration



Google's former CEO Eric Schmidt channeled money into the White House science office through his foundation, according to a report. Schmidt, who stepped down in his role at Google's parent company Alphabet in 2020, now serves on the board of numerous tech companies, including some focused on artificial intelligence (AI). The Office of Science and Technology Policy (OTSP) helps formulate AI policy and steer funding toward the technology. Former OTSP general counsel Rachel Wallace repeatedly raised concerns over Schmidt's influence, which she believes was the source of the wrath she faced from the OTSP's former head Eric Landers, who stepped down recently for bullying women in the office. Landers and Schmidt are close associates. Wallace filed a whistleblower complaint and is now being represented by the Government Accountability Office.

*Figure 2: Professional Assholes Always Hang Out Together*

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1 More than a dozen officials in the 140-person White House office have been associates of  
2 Schmidt's, including some current and former Schmidt employees, according to interviews with  
3 current and former staff members and internal emails obtained by POLITICO.

4  
5 **SEE:**

6 [Google's Remarkably Close Relationship With The White House... - The Intercept](#)  
7 [https://theintercept.com › 2016 › 04 › 22 › googles-remarkably-close-relationship-with-the-](#)  
8 [obama-white-house-in-two-charts](#)

9 **The Intercept** teamed up with Campaign for Accountability to present two revealing data  
10 sets from that forthcoming project: one on the number of White House meetings attended by  
11 **Google...**

12  
13  
14 Schmidt maintained a close relationship with the president's former science adviser, Eric  
15 Lander, and other Biden appointees. And his charity arm, Schmidt Futures, indirectly paid the  
16 salaries of two science-office employees, including, for six weeks, that of the current chief of staff,  
17 Marc Aidinoff, who is now one of the most senior officials in the office following Lander's  
18 resignation in February. The chief innovation officer at Schmidt Futures, OSTP alum Tom Kalil,  
19 also remained on Schmidt's payroll while working as an unpaid consultant at the science office for  
20 four months last year until he left the post following ethics complaints.

21 Schmidt has long sought to influence federal science policy, dating back to his close ties to  
22 the Obama administration. While his spokespeople presented his efforts to help Biden as part of  
23 Schmidt Futures' mission to "focus and mobilize these networks of talent to solve specific problems  
24 in science and society," his foundation's involvement in funding positions for specific figures raised  
25 repeated red flags from internal White House watchdogs. It appears that Schmidt runs "The Deep  
26 State" inside the White House.

27  
28 The science office's efforts to arrange for Schmidt Futures to pay the salaries of Lander's

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1 staff sparked “significant” ethical concerns, given Schmidt’s financial interests in areas overlapping  
2 with OSTP’s responsibilities, according to the science office’s then-general counsel, Rachel  
3 Wallace, in internal emails obtained by POLITICO.

4  
5 Schmidt sits on the boards of a wide variety of technology companies, particularly those  
6 focused on artificial intelligence. He maintains a 20 percent stake in the [hedge fund DE Shaw](#) that  
7 boasts over \$60 billion in investments and committed capital, sits on the board of the AI-focused  
8 defense contractor Rebellion Defense, is [an investor in Abacus.AI](#) and this month invested in and  
9 became chair of Sandbox AQ – a new company that is a spin-off of an internal Google software  
10 team that [says it will combine](#) “AI + Quantum tech to solve hard problems impacting society.” (It  
11 will likely just rig elections like Schmidt always does...)

12 He [also helped launch and is on the board of Civis Analytics](#), a data science company that  
13 has helped Democratic campaigns, including Biden’s 2020 effort, target consumers and voters.

14  
15 Over the past year, internal emails show that Wallace and other members of the science  
16 office’s legal team regularly flagged potential conflicts of interests related to Schmidt and Schmidt  
17 Futures.

18  
19 Last fall, Wallace lodged a formal complaint about Lander’s treatment of her as an  
20 employee. Lander resigned Feb. 18 after [POLITICO reported that the White House had found](#)  
21 “credible evidence” that he bullied Wallace and violated workplaces standards with other staffers.

22  
23 Wallace says she thinks Lander’s bullying was in response to her consistently raised ethical  
24 objections to Lander’s plans, including the office’s solicitation of funding from Schmidt-connected  
25 organizations for extra staff.

26  
27 “I and others on the legal team had been noticing a large number of staff with financial  
28 connections to Schmidt Futures and were increasingly concerned about the influence this  
organization was able to have through these individuals,” Wallace, who is now being represented by

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1 the Government Accountability Project as a whistleblower, told POLITICO. GAP and Wallace  
2 formally [filed a whistleblower complaint in early March.](#)

3  
4 A spokesperson for Lander declined to address specific issues but said: “Throughout his  
5 tenure, Dr. Lander strictly adhered to all White House ethics policies.”

6 The White House said there was nothing unusual about its ties to Schmidt and that ethical  
7 issues were promptly and properly handled.

8  
9 A foundation controlled by Eric Schmidt, the multi-billionaire former CEO of Google, has  
10 played an extraordinary, albeit private, role in shaping the White House Office of Science and  
11 Technology Policy over the past year. | AP Photo/Lee Jin-man

12 Some of the Schmidt-affiliated money came in the form of Schmidt Futures fellowships,  
13 which pay for people’s travel and expenses to science conferences. Last July, OSTP legal analyst  
14 Min Hee Kim wrote to one OSTP employee asking her to withdraw from the fellowship because her  
15 White House position and Schmidt Futures’ “strong interest in scientific discoveries and innovative  
16 technologies,[which] poses a very significant conflict of interest.” After Kim and other legal  
17 officials raised concerns, two employees withdrew from such arrangements.

18  
19 Two other OSTP officials continued to work part-time at the Broad Institute of Harvard and  
20 MIT in Cambridge, Mass., a leading biotech facility that had been headed by Lander and where  
21 Schmidt chairs the board. The White House had approved the arrangement in advance, according to  
22 both the Broad Institute and OSTP. Both employees have since left OSTP.

23  
24 Two more staffers also had their salaries paid through a fund with the Federation of  
25 American Scientists that Schmidt Futures pays into. The chair of FAS, Gilman Louie, is also an  
26 associate of Schmidt’s who most recently served with him on the National Security Commission on  
27 Artificial Intelligence, which Schmidt chaired from 2018 to 2021. Gilman Louie founded In-Q-  
28 TEL, the CIA operation.



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1 Spokespeople for Schmidt said that the gift to FAS was “unrestricted” and did not direct  
2 funding for any specific fellowship at OSTP.

3  
4 FAS spokesperson Dan Correa said in a statement that “Like many other scientific  
5 organizations, we offer pathways for scientists and technologists to engage in public service and  
6 deeply value their important contributions.”

7 Schmidt, who is estimated [to be worth \\$23 billion](#), founded Schmidt Futures with his wife  
8 Wendy to support and promote emerging technologies such as a [recently announced \\$125 million](#)  
9 [fund for artificial intelligence.](#)

10  
11 Schmidt also has very close ties to Lander, the founding director and president of the Broad  
12 Institute, whose prodigious fund-raising and scientific oversight turned the institute into a biotech  
13 behemoth.

14 Schmidt has served on the board of the Broad Institute since 2012 and served with Lander  
15 on the President’s Council of Advisors on Science and Technology during the Obama  
16 administration. They also served together on the Pentagon’s Defense Innovation Board,  
17 which Schmidt chaired, from 2016 to 2020.

18  
19 Shortly after Biden nominated Lander to head OSTP, Broad announced that Schmidt and his  
20 wife had given a \$150 million endowment gift to the Broad Institute to “catalyze a new scientific  
21 discipline at the intersection of biology and machine learning,” [according to a March 2021 press](#)  
22 [release](#). In April 2021, before Lander’s confirmation, the Broad Institute announced that [Schmidt](#)  
23 [would become chair of the board of directors](#) of the Institute.

24  
25 Through spokespeople, the Broad Institute and Schmidt said that the \$150 million gift had  
26 been in the works since early 2020.

27 “The timing allowed us to recruit leadership for the new center and gave the new leaders  
28 time to build a research plan prior to the formal launch,” said a Broad Institute spokesperson.

**A focus on spy AI and spying on users 5G**

Schmidt has made the development of 5G technology and artificial intelligence key aspects of his post-Google work and has advocated for a stronger federal role in funding both, along with biotech initiatives.

The White House science office sets strategic priorities for the nation's more than \$1.4 trillion in annual health and science spending. It has also been increasingly focused on federal policy on artificial intelligence.

A spokesperson for the science office disputed the idea that its work dovetailed with Schmidt's priorities and pointed to its efforts to regulate the use of AI.

"You're trying to tell a story of agency capture — that one philanthropy has influence over policy outcomes," the spokesperson said in a statement. "And yet, OSTP is executing on an aggressive agenda to protect the civil rights of all Americans impacted by algorithmic discrimination in the use of artificial intelligence and automated systems, is working across government to gather data that will help ensure that government delivers services more equitably, and is evaluating the mental health harms caused by social media platforms. We are proud to be defined by our work."

As for the number of personnel connected with Schmidt Futures, the spokesperson explained: "As a small office with a \$5 million annual budget that had just become cabinet level and was charged with addressing huge issues like the climate and future pandemics, OSTP senior staff, including Eric Lander, pushed to find ways to quickly bring on subject matter experts. As part of the onboarding process, OSTP's legal counsel reviews potential ethical conflicts and directs remedial actions or recusals."

The spokesperson added: "Furthermore, consistent with Congress's statutory direction, OSTP works with numerous outside groups on a variety of important and critical science and technology matters, and staff come to OSTP from many different federal agencies, universities, and

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1 outside entities.”

2  
3 Indeed, OSTP’s founding statute in 1976 states that the director shall “utilize the services of  
4 consultants” to help fulfill the office’s mission. OSTP ethics officials were alarmed, however, by the  
5 extent to which Schmidt Futures was involved in the hiring and use of consultants and fellows,  
6 according to their internal emails.

7 [White House](#)

8  
9 [Biden’s top science adviser bullied and demeaned subordinates, according to White](#)  
10 [House investigation](#)

11 By Alex Thompson

12 Norm Eisen, who served as the White House ethics chief early in the Obama administration,  
13 said of Schmidt Futures: “You might say that the desire of a philanthropy to support government is  
14 noble, but at least the appearance question that is raised is whether government should be making its  
15 own determinations about that. There should not be the appearance that perhaps outside actors are  
16 unduly shaping that policy.”

17  
18 Of the concerns raised by internal ethics officials, Eisen added, “it’s not all appearances  
19 issues here. There are some significant challenges that were identified. I do think that those are  
20 meritorious and the White House came out in the right place in the end. The ethics sausage making  
21 isn’t always pretty.”

22 **A foray into politics**

23 Schmidt’s relationship with powerful Democrats dates from the 1990s. [As CTO of Sun](#)  
24 [MicroSystems, he helped develop Bill Clinton’s first White House website](#) at WhiteHouse.gov in  
25 1994.

26  
27 When Schmidt was CEO of Google, he hit [the campaign trail for Obama in October of 2008](#)  
28 but explained he was “doing this personally” since “Google is officially neutral.”

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1 During the Obama administration, while Schmidt served as Google CEO and later executive  
2 chair, company representatives attended White House meetings more than once a week, on average,  
3 from 2009 to 2015, [according to an analysis by The Intercept and the Campaign for Accountability](#).

4  
5 During Obama's 2012 election reelection campaign, while he was still Google's executive  
6 chairman, Schmidt helped recruit talent and advise on technology and [was among senior staffers and](#)  
7 [volunteers in the campaign's "boilerroom" on election night](#).

8 He went all-in for Hillary Clinton in 2016. In April 2014, a year before Clinton announced  
9 her candidacy, he sent her senior aide Cheryl Mills a long memo entitled "Notes for a 2016  
10 Democratic Campaign." At her election night party in 2016, he was photographed wearing a "staff"  
11 badge.

12  
13 After Donald Trump beat Clinton, Schmidt sought to smooth the waters with the incoming  
14 administration. He concentrated on developing ideas for artificial intelligence policy while also  
15 strengthening his relationships with Democratic officials seen as likely to join the next Democratic  
16 administration.

17 In 2018, Congress created the National Security Commission on Artificial Intelligence to "to  
18 consider the methods and means necessary to advance the development of artificial intelligence,  
19 machine learning, and associated technologies to comprehensively address the national security and  
20 defense needs of the United States." Schmidt became the chair, nominated by then-chair of  
21 the House Armed Services Committee, Republican Mac Thornberry of Texas.

22  
23 Schmidt [told The New York Times in 2020](#) that "the way to understand the military is that  
24 the soldiers spend a great deal of time looking at screens. And human vision is not as good as  
25 computer vision," he said, explaining why AI should be used for functions currently handled by  
26 humans. "It's insane that you have people going to service academies, and we spend an enormous  
27 amount of training, training these people, and we put them in essentially monotonous work."  
28

1 While he had left Google's board by 2019, he still retained \$5.3 billion in shares of Google's  
2 parent, Alphabet, while chairing the NSCAI.

3  
4 Schmidt Futures also set about establishing relationships with the next Democratic  
5 administration-in-waiting. When now-Secretary of State Antony Blinken co-founded the consulting  
6 firm West Exec Advisors in 2017 along with Michèle Flournoy, who was then seen as a frontrunner  
7 to be secretary of Defense, Schmidt Futures became one of their clients. Flournoy participated in a  
8 2020 Biden fundraiser [with Schmidt that was billed](#): "Virtual Conversation on Technology and  
9 National Security."

10 West Exec was also the professional home to several additional people who are now high-  
11 ranking officials in the Biden administration, including Director of National Intelligence Avril  
12 Haines and Deputy Attorney General Lisa Monaco, both of whom were West Exec employees.

13  
14 In July of 2021, at the "Global Emerging Technology Summit" hosted by the NSCAI, which  
15 has since been disbanded by statute, [Blinken thanked Schmidt and referred to him](#) as a "friend."

16 The State Department declined to comment.

### 17 18 **Driven to shape federal policy**

19 People in the technology space say Schmidt's efforts to cultivate leading Democrats have  
20 been motivated largely by his genuine concerns about the focus of federal science policy. Detractors  
21 portray him as an unelected billionaire favoring policies that could further enrich and empower  
22 himself and the organizations in which he's involved. But those more sympathetic to him say  
23 that, even if he occasionally enters ethical gray zones, Schmidt is driven by his belief that economic  
24 and military power in the 21st century will go to whichever country is the leader in technology,  
25 particularly AI.

26  
27 Ylli Bajraktari — the former executive director of the NSCAI who is now the CEO of the  
28 Schmidt-backed, AI-focused Special Competitive Studies Project that launched after NSCAI wound



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1 down — explained that “Eric believes that AI sits at the center of the constellation of emerging  
2 technologies, enabling some and being enabled by others. For instance, 5G and quantum computing  
3 are poised to enable newgrowth in AI capabilities, while AI stands to transform the biological  
4 sciences, producing significant technologicalbreakthroughs and turning the biotechnology sector  
5 into one of the primary drivers of overall economic competitiveness.”

6  
7 Bajraktari pointed to Schmidt’s recent book, “The Age of AI,” co-written with Henry  
8 Kissinger, and added that “the competitive backdrop with China is important. Do we really want  
9 China leading the world in AI-enhanced synthetic biology? Given the central role of thegovernment  
10 in shaping scientific innovation, of course he wants to help. He has said many times that we need to  
11 base these technologieson our values and norms otherwise we shouldn’t develop them.”

12 “Eric believes that AI sits at the center of the constellation of emerging  
13 technologies, enabling some and being enabled by others.”

14  
15 Ylli Bajraktari, former executive director of the NSCAI

16 But his efforts have regularly raised concerns about potential conflicts of interest. In 2016, a  
17 Pentagon employee working with theDefense Innovation Board, Roma Laster, filed an ethics  
18 complaint against Schmidt, claiming that he quizzed a briefer about whetherthey had considered  
19 using Cloud computing services other than Amazon’s, as ProPublica reported.

20  
21 Google also provides such services.

22  
23 Laster, who also raised concerns about former Defense Secretary James Mattis’ closeness  
24 with Amazon’s Jeff Bezos in 2017, wasultimately moved off working with the Defense Innovation  
25 Board by the Pentagon.

26 Biden’s election in 2020 opened new doors for Schmidt, especially when his close associate  
27 Lander was tapped to head thescience office.  
28

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1 Wallace and other officials say Lander showed a keen interest early on in securing outside  
2 funding for staff to bulk up the science office.

3  
4 In Lander's first meeting with Wallace, the science office's ethics officer, on Feb. 2, 2021,  
5 Lander asked her "if there would be any reason why he could not contact universities and  
6 Fellowship organizations and let them know about organizations who would be willing to provide  
7 them with funding to sponsor individuals to come work at OSTP," according to a contemporaneous  
8 memo Wallace wrote after the meeting.

9 Wallace said bringing on staff through such avenues would raise ethical concerns since the  
10 funding companies may have an interest in science policy.

11  
12 "I responded that I would advise strongly against doing so, as it would appear as though  
13 OSTP were soliciting funds on behalf of these organizations and would imply OSTP endorsement of  
14 these funding organizations," Wallace wrote at the time. Lander "strongly pushed back and said that  
15 this was a 'thread he would want to continue' at a later time."

16 In May of 2021, Michael Schmoyer, the OSTP's assistant director for health security threats,  
17 arranged for the office's national security team to join a brown-bag session with Kalil, the chief  
18 innovations officer at Schmidt Futures, according to an email sent to the office's then-chief of staff  
19 Kei Koizumi by its deputy director for national security, Jason Matheny.

20  
21 Matheny, who had previously served on the NSCAI as a commissioner under Schmidt,  
22 asked Koizumi if he could "invite all new staff to have a similar informal brown bag with Tom" and  
23 whether OSTP could "get him an unpaid SGE or consultancy role so that he can more easily provide  
24 feedback on how to turn ideas into policy?"

25  
26 Through an OSTP spokesperson, Matheny said "his only substantive interactions with  
27 Schmidt were through the Commission, and all that is public record, and he has had no relationship  
28 with Schmidt Futures."

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1 Besides Matheny, three other staffers on the NSCAI, Jessica Young, Chris McGuire, and  
2 Nik Marda, have landed at OSTP.

3  
4 Starting in June, Kalil worked as a part-time unpaid consultant at OSTP while continuing his  
5 job at Schmidt Futures.

6 A spokesperson for Lander said in a statement: “The White House engaged Tom Kalil as an  
7 unpaid consultant prior to when Dr. Lander assumed leadership of the agency. Dr. Lander only  
8 learned about Mr. Kalil’s appointment from reading about it in an all-staff email several weeks  
9 later.”

10  
11 An OSTP spokesperson said that Kalil “was brought on as a former OSTP staffer and expert  
12 in government policy processes who could explain to a new team at OSTP how to move policy  
13 forward,” given his previous work at the science office during the Obama administration.

14 The spokesperson added: “To the extent that any particular OSTP matter would arise  
15 involving Schmidt Futures, Tom would be recused from participating personally and substantially  
16 in those matters.”

17  
18 Emails and notes at the time, however, show that Kalil was involved in at least one instance  
19 of securing Schmidt Futures funding for OSTP personnel.

20  
21 On Aug. 30, Elaine Ho, the office’s deputy chief of staff for workforce, wrote in an email  
22 that the office had found a way to bring on board Marc Aidinoff, a former Biden adviser who is now  
23 the office’s chief of staff.

24 At The Department of Energy, she wrote, “has secured Schmidt Futures as a funding source  
25 for Marc [Aidinoff]... I have already reached out to our contact at FAS/Day One; and Kei  
26 [Koizumi] has already reached out to Tom [Kalil].”

27  
28 Aidinoff, the email said, would come on board as one of FAS’s “Day One” fellows.

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1 In reply to Ho, Wallace wrote that Kalil's involvement in securing funding was "a  
2 significant conflict of interest, given his dual roles. My strong and urgent advice to you is to redirect  
3 this process and determine if there is another mechanism available to bring Marc on."

4  
5 Aidinoff ultimately worked at OSTP for about six weeks under an FAS fellowship which  
6 was paid out of a fund to which Schmidt Futures is a donor, according to spokespeople for Schmidt  
7 and OSTP. After those six weeks, OSTP brought him on more formally in mid-September as acting  
8 chief of staff, ending the fellowship.

9 An OSTP spokesperson said in a statement that "Ho was one week into her new assignment  
10 at OSTP as a workforce development advisor to help build out the team when she sent the August 30  
11 email referring to 'Schmidt Futures' funding....Because Ho explained it to Aidinoff as 'Schmidt  
12 Futures' funding, Aidinoff also expressed ethics concerns."

13  
14 After that exchange, Wallace said, she told Kalil separately that "he could not arrange for  
15 Schmidt Futures and any other organization to pay the salaries of OSTP staff. He said he would  
16 continue to do so regardless as that was one of the reasons he had been hired." That exchange  
17 matches Wallace's notes at the time.

18 On Oct. 6, Kalil told Wallace that he was leaving OSTP after only a few months. When  
19 Wallace asked why he had decided to leave so soon, Kalil said that Koizumi wanted to "create more  
20 ambiguity about his role in finding and arranging funding for OSTP staff," according  
21 to contemporaneous notes taken by Wallace.

22  
23 Through a Schmidt Futures spokesperson, Kalil declined to say whether his recollections  
24 match Wallace's.

25 In a text message, Koizumi told POLITICO: "if that's what Tom said, I don't know what to  
26 say. Rachel should also have the notes stating that I made the decision to terminate [Kalil's] unpaid  
27 consultancy to avoid the appearance of conflicts of interest, even though he was already recused  
28

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1 from matters involving [Schmidt Futures].”

2  
3 In part because of personal clashes over ethics guidelines, Wallace alleges that Lander  
4 sidelined her and, in September, demoted her to deputy counsel. Soon after, Wallace filed a  
5 complaint about Lander’s behavior and her job change. While the White House found that Wallace’s  
6 demotion wasn’t “procedurally improper,” it confirmed that Lander had treated her and others in  
7 ways that violated administration standards.

8 **A legacy of extremists**

9 While Lander has left the White House, Schmidt retains connections to OSTP, through his  
10 former employees and associates who work there.

11  
12 Eric Schmidt retains connections to OSTP, through his former employees and associates  
13 who work there.

14 Lindsay Gorman, a senior policy adviser for technology strategy at OSTP, was a policy  
15 consultant at Schmidt Futures from May 2020 to January 2021, according to her LinkedIn profile.

16  
17 Gorman declined to comment through an OSTP spokesperson.

18  
19 Justin Lynch, a policy advisor on artificial intelligence at OSTP until last September, joined  
20 [a new Schmidt AI venture called the Special Competitive Studies Project](#) while remaining an unpaid  
21 consultant at OSTP, according to Wallace. Despite remaining a consultant, an OSTP spokesperson  
22 said that “Lynch has done no further work for OSTP since his departure as a state member in  
23 September.” After POLITICO’s inquiry, OSTP ended his consultancy.

24  
25 Lynch did not respond to a message requesting comment.

26 Alexander Macgillivray, the principal deputy United States Chief Technology Officer who  
27 had a similar role in the Obama administration’s OSTP, was Google’s associate general counsel for  
28 products and intellectual property when Schmidt was CEO. An OSTP spokesperson said that



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1 “Macgillivray last worked at Google in 2009, and tells us he has not talked to Schmidt since 2017 or  
2 2018.”

3  
4 Beyond OSTP, Schmidt also has influence in other parts of the Biden administration. In  
5 2019, he helped launch and joined the board of Rebellion Defense, which pitches itself as creating  
6 artificial intelligence software for the defense industry.

7 Two officials from Rebellion Defense joined the agency review teams on Biden’s transition  
8 team. It was a win for the young company as no employees at major defense contractors landed on  
9 the agency review teams, [The American Prospect reported](#).

10  
11 Since Biden took office, [Rebellion Defense has received 10 defense contracts](#), [according to](#)  
12 [the watchdog Tech Inquiry](#). On September 15, [Axios reported](#) the young company had raised \$150  
13 million dollars at a \$1 billion valuation.

14 Ties to Rebellion have already proved thorny for some members of the Biden  
15 administration.

16  
17 Mina Hsiang, administrator of the US Digital Services, sold her investment in Rebellion on  
18 September 30, weeks after being tapped for the role. The investment was only worth between  
19 \$15,000 to \$50,000 in January 2021 when she initially joined the Biden administration. It was worth  
20 between \$500,000 and \$1 million when she sold it, according to her disclosure forms, [prompting a](#)  
21 [complaint from an ethics watchdog](#).

22  
23 The White House declined to make Hsiang available for an interview. In a statement, a  
24 White House official said, “OMB Office of General Counsel reviewed the circumstances behind two  
25 government procurements for Rebellion Defense since Mina began serving at USDS, and  
26 determined that neither USDS nor Mina had anything to do with the DOD procurements from  
27 Rebellion Defense. Neither procurement officer knew there was anyone in the US government with  
28 any financial interest in Rebellion Defense.”

1 A Rebellion spokesperson confirmed that the company [has received 10 defense contracts](#)  
2 under the Biden administration, but declined to comment further.

3  
4 Besides AI, Schmidt has also taken a keen interest in the future of 5G telephone technology,  
5 [which is within the OSTP's portfolio](#) and is a key policy challenge for the Biden administration. In  
6 February, Schmidt wrote an opinionpiece in [the Financial Times](#) and participated in a [The Wall](#)  
7 [Street Journal](#) debate criticizing the United States' current approach to 5G.

8 In the FT, he said he estimated the necessary infrastructure would cost \$70 billion. He  
9 wrote: "Without it there will be no 5G, and nobase on which to build 6G, America's digital  
10 economy will become an also-ran." CIA, FBI, NSA and Plaintiffs investigators have large files on  
11 Mr. Schmidt as a rogue government official driven by a sociopathic mania. Eric Schmidt, Elon  
12 Musk, Larry Page, Steve Jurvetson, Mark Zuckerberg and this Cartel are White House sanctioned  
13 mobsters. Word search this document for "**Eric Schmidt**", then read **all** of the news stories and  
14 investigation articles that come-up.

## 15 16 17 **THE PSYCHOLOGY OF THE CARTEL MEMBERS**

18 No sane reader can examine all of the facts on each of these Cartel '*enterprise*' members  
19 and not easily realize that they are "untouchable" criminals that harm society and government,  
20 horrifically, on a daily basis. Psychology experts state that "*assholes choose to hang out with other*  
21 *assholes because their perverted psychology requires mutual validation by a walled-garden echo-*  
22 *effect of equally horrific peers that reinforce their sex-trafficking, bribery, money laundering and*  
23 *other corruption as 'OK'...*". This explains the culture of asshole-ism in these specific groups in  
24 Washington, DC and Silicon Valley. Read more about this at:


25  
26 <https://futurism.com/neoscope/asshole-psychology>

27 <https://www.linkedin.com/pulse/what-makes-a-hole-ahole-ray-williams>  
28

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1 <https://www.psychologytoday.com/us/blog/beautiful-minds/202008/the-anatomy-assholes>  
2  
3 [https://www.vox.com/conversations/2017/9/26/16345476/stanford-psychologist-art-of-](https://www.vox.com/conversations/2017/9/26/16345476/stanford-psychologist-art-of-avoiding-assholes)  
4 [avoiding-assholes](https://www.vox.com/conversations/2017/9/26/16345476/stanford-psychologist-art-of-avoiding-assholes)

5 and the associated report PDF:  
6 **Stanford\_University\_Teaches\_Promotes\_And\_Protects\_Sociopaths\_And\_Hate.pdf**

7  
8  
9 [\*\*White House Cozied Up to Google Before ... - The Intercept\*\*](#)  
10  [https://theintercept.com › 2016 › 08 › 18 › white-house-official-cozied-up-to-google-](https://theintercept.com › 2016 › 08 › 18 › white-house-official-cozied-up-to-google-before-antitrust-lawsuit-was-shelved)  
11 [before-antitrust-lawsuit-was-shelved](https://theintercept.com › 2016 › 08 › 18 › white-house-official-cozied-up-to-google-before-antitrust-lawsuit-was-shelved)

12 In April, the Campaign for Accountability found — and The **Intercept** published —  
13 evidence from the White House's own records of frequent meetings between **Google** staff and  
14 Obama **administration**...

15 [\*\*Must-Read: Intercept's Exposé on Google's Remarkably Close ...\*\*](#)  
16  [https://precursorblog.com › ?q=content › must-read-intercept's-exposé-google's-](https://precursorblog.com › ?q=content › must-read-intercept's-exposé-google's-remarkably-close-white-house-ties)  
17 [remarkably-close-white-house-ties](https://precursorblog.com › ?q=content › must-read-intercept's-exposé-google's-remarkably-close-white-house-ties)

18 **The Intercept's** exposé " The Android **Administration: Google's** Remarkably Close  
19 Relationship With the Obama White House, in Two Charts " is an eye-opening, must-read for  
20 anyone interested in **Google's** outsized power and political influence, or in the integrity of the U.S.  
21 Government's public accountability and impartiality in administering justice and the federal  
22 policymaking ...

23  
24  
25 10. There are 8 billion people in the world and over 5 million companies in the world. Why are  
26 the same 20 people; from the same 6 companies; that are all within 10 blocks of each other; that all  
27 went to the same frat houses; that all go to each other's parties; that control the same crooked  
28

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1 ‘Panama Papers’-type CPA’s, Law Firms, Media Attackers and Lobbyists; that operate all this  
 2 felonious larceny connected in this way unless it is a “criminal enterprise” in violation of RICO  
 3 laws? On top of that, Defendants confided to Plaintiffs that “*they are the new Mafia*” and produced  
 4 Mafia documents and Mafia photo tributes to themselves (attached herein). They said that they  
 5 “...sought to control The White House and Sacramento Government offices so they could steer all  
 6 the taxpayers public funds and power to their personal pockets...” , an act they fully accomplished!  
 7 A deep state is a type of governance made up of potentially secret and unauthorized networks of  
 8 power operating independently of a [state](#)’s political leadership in pursuit of their own agenda and  
 9 goals. In popular usage, the term carries overwhelmingly negative connotations.[\[2\]](#) The range of  
 10 possible uses of the term is similar to that for [shadow government](#). The expression state within a  
 11 state is an older and similar concept. Historically, it designated a well-defined organization which  
 12 seeks to function independently,[\[3\]](#) whereas the deep state refers more to a hidden organization  
 13 seeking to manipulate the public state. Congressional and other government officials have  
 14 confirmed that a portion of the UNITED STATES OF AMERICA is operated by and organized as  
 15 this Deep State operation including the administrators of this section of the government, listed by  
 16 name, in the attached **EXHIBITS. The U.S. must arrest the persons listed herein but has, so far,**  
 17 ***refused to arrest the key operatives because those person’s are the financiers and media***  
 18 ***manipulators for the White House Administration.***

## 20 KEY CASE DETAIL EXPLANATIONS

### 22 A. CLARIFICATION 1:

24 Plaintiffs claims arise **not** from an alleged conspiracy to deprive Plaintiffs of a grant, as  
 25 presumed in the Court’s first response. Plaintiffs received his Congressionally awarded grant and  
 26 delivered in full, his work product, to the United States; unlike all of the other Dept of Energy  
 27 program peers, who grabbed the federal money and instantly went bankrupt and profiteered on the  
 28 tax write-offs. ***Plaintiffs alleges reprisal, vendetta, and revenge by government officials as***

1 *retribution for reporting violations of RICO laws, Anti-Trust Laws and other crimes, in a*  
2 *criminal program involving U.S. public officials. Plaintiffs also alleges RICO-organized business*  
3 *harms to his companies and issued patents.*

4 Plaintiffs losses from said state-sponsored vendetta reprisal attacks operated via A.)  
5 command-and-control, B.) systems use and C.) financing by corrupt U.S. employees and contractors  
6 in The White House, government agencies and Congress wherein those bodies were infected by  
7 corruption as reported by the FBI, DOJ, SEC, OSC, FEC, FINCEN, INTERPOL, ICIJ,  
8 WIKILEAKS, CBS NEWS, CONGRESSIONAL ETHICS COMMITTEES AND hundreds of other  
9 government bodies. Plaintiffs in no way asserts that the U.S. government is “bad”. Plaintiffs “IS”  
10 part of the U.S. Government and his family are in historical records for founding The U.S.  
11 Government at Plymouth Rock with the creation of “The Declaration of Government” signed by  
12 Plaintiffs past grandfather. Plaintiffs simply echos the fact that authorities have proven that some  
13 people in the U.S. government are criminal mobster scum-bags who must be excised. Plaintiffs  
14 cousin ran operations for a famous government official: **John Hancock**, who signed another famous  
15 government formation document.



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Figure 3: Plaintiffs relative working for THE John Hancock that signed THE U.S. Constitution

Plaintiffs relatives have, for generations, served in either the military, the intelligence community or in education ***in service to the public***. Plaintiffs will not stand-by and watch carpetbagging dynastic filth buy and trade his government like it was a hillbilly garage sale!

***B. PROTECTION AND ‘DOE’ STATUS RECONSIDERATION REQUEST:***

Plaintiffs asks the Court to **re-consider** Plaintiffs request for protection via the more detailed threat explanations, below, which proves that Plaintiffs have threats of death, was attacked, has

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1 extreme vulnerability to retaliation, has already had his life destroyed by Defendants attacks and  
2 that it is in the public's interest for Plaintiffs to stay alive and unharmed so that he can continue to  
3 protect taxpayers from corruption. Plaintiffs attacks are now detailed in the body of the complaint as  
4 well as the attached **EXHIBITS which are part and parcel of this filing**. The details are now less  
5 broad and much more specific. The actual threats and attacks are detailed, herein, to a greater  
6 degree. Actual evidence of harassment, shadow-bans and cyberstalking are provided. Plaintiffs have  
7 over 3 million pages of evidence and many hours of video evidence posted online. Any appearance  
8 of Plaintiffs name on any server, dating site, government site or other electronic location damages  
9 Plaintiffs because these hired attack companies use computerized cyber-assassin software:

10 *Cardinal & Pine*; *Pacronym, Acronym*; *The Americano*; *Investing in US*; *Shadow Inc*; *Courier*  
11 *Newsroom*; *IN-Q-Tel*; *Gawker Media*; *Jalopnik*; *Gizmodo Media*; *K2 Intelligence*; *WikiStrat*;  
12 *Podesta Group*; *Fusion GPS*; *Clearview AI Face Tracking*, *Google*; *YouTube*; *Alphabet*;  
13 *Facebook*; *Twitter*; *Think Progress*; *Media Matters*); *Black Cube*; *Correct The Record*; *Orbis*  
14 *Business Intelligence*, *Undercover Global Ltd*; *Stratfor*; *Jigsaw*; *ShareBlue/Acronym*; *Versa*  
15 *LLC*; *American Ledger*; *Supermajority News*; *New Venture Fund*; *Sixteen Thirty Fund*;  
16 *Cambridge Analytica*; *Sid Blumenthal*; *States Newsroom*; *Hopewell Fund*; *Open Society*.;  
17 *Palantir*, *Kroll*, *David Brock*; *AmpliFire News*; *American Bridge*; *Plouffe Consulting*; *Pantsuit*  
18 *Nation*; *MotiveAI*; *American Bridge 21st Century Foundation*; *Priorities USA*; *PR Firm*  
19 *Sunshine Sachs*; *The American Independent Foundation*; *Covington and Burling*; *Buzzfeed*;  
20 *The American Independent*; *Perkins Coie*; *Secondary Infektion*; *Wilson Sonsini* and thousands  
21 more are hired to scan EVERY database, every hour to run hit-jobs, character assassinations, dirty  
22 tricks and economic reprisal attacks on Plaintiffs, and any targets who reported the crimes. For his  
23 own security, Plaintiffs have helped to place an "insurance" policy data set on servers around the  
24 globe, on in-orbit satellites launched by others and in torrent files that look like movie files but are  
25 actually encrypted data sets, residing around the globe. Agents for Plaintiffs will release those data  
26 sets upon the untimely death, coma-state harm or severe interdiction harm to Plaintiffs.

**C. CLARIFICATION 2:**

Plaintiffs have been diagnosed with numeric dyslexia AKA Dyscalculia and Asperger Syndrome as well as cellular-level radiation and nano-toxin blood poisoning from his Congressionally awarded work for the U.S. Department of Energy helping to build America's energy back-up plan chemistry, including solvents and micro-particulants detailed in his issued federal patents as well as EMF, beta-voltaic, terra-hertz radiations and other radiation technologies such as that associated with thorium, plutonium, uranium and other radioactives used for energy storage and deployment. The Dyscalculia prevents him from numeric processes beyond 3 digits. The Asperger gives him incredible investigative skills but prevents him from fully understanding legal language which is a non-organic, non-emotive communications form. The blood poisoning makes him tired at different intervals. The Court's indulgence in these medical issues is requested. Plaintiffs, his entire life, has been required to use a CPA and a lawyer for all activities relating to the specialties of those two positions due to the Dyscalculia so it is odd (and "exceptional") that he is denied an attorney to represent him in this case. Plaintiffs have also suffered from PTSD caused by Defendants actions, threats and harms and the suspicious deaths of those other victims/whistle-blowers known to Plaintiffs and listed, by name, herein.

**D. ATTORNEY REQUEST RECONSIDERATION ADDITIONAL FACTS:**

Plaintiffs still maintains it is in the best interest of the Court and the public to appoint a qualified lawyer, equitable to the legal counsel used by Defendants, for Plaintiffs. Plaintiffs can't understand "legalese", can't make a logical trial hearing sound as good as a real lawyer could, to the Jury, when the emotional stress of this case has devastated Plaintiffs and Defendant has billions of dollars at their disposal while Plaintiffs have none.

Plaintiffs entire knowledge base as to when to shout out the word "objection", comes from watching a few TV episodes of "**Law and Order**". Also, Plaintiffs are not articulate in such settings. Plaintiffs can't recall dates and numbers in person and on-the-spot. He must go back and look at his

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1 notes. Where Plaintiffs other goal, aside from getting his money and his house back, is to expose  
2 this corruption on public record, ON BEHALF of the public, it only makes sense that a lawyer  
3 could do that best for all concerned. Plaintiffs absolutely does not understand legal issues. His latest  
4 help in drafting this comes from buying law students a sandwich at Hastings and Santa Clara law  
5 schools. That hardly counts as 'adequate legal resources'. Plaintiffs are suing THE LARGEST,  
6 MOST RESOURCED, DEFENDANTS ON EARTH and has no lawyer. **Really?!... does that**  
7 **actually seem like a fair fight?** Those circumstances seem pretty "exceptional" and the law says  
8 that individual, public-interest, senior, low-income, disabled Plaintiffs fighting for justice on behalf  
9 of the public and themselves are "exceptional", present "exceptional" circumstances and should be  
10 given the "exception" by the Court, to be fairly represented by a Court Appointed Counsel paid for  
11 by the Court. The Court gives murderers a free Court appointed lawyer every day. Why does a  
12 person, such as Plaintiffs, who put his life on the line for his nation not get a lawyer from the Court  
13 when scumbag animals that take the lives of innocent children get a free one from the Court all day  
14 long? Plaintiffs does not have the slightest clue how to look up legalese or cite case numbers or  
15 which laws were violated according 'citation numbers' and lawyer codes and his Dyscalculia makes  
16 it restrictively hard to do so. There is no justice for the Plaintiffs if he can't understand the secret  
17 language of lawyers. The CIA told Plaintiffs "*Learn Russian*".. then years later they said:  
18 "*nawwww, forget about learning Russian. Learn Syrian*". The Court is asking Plaintiffs to learn a  
19 language (lawyer talk, which is as hard as learning Russian from scratch) that he will never use  
20 again, that takes ten+ years to learn properly and that lawyer language changes every year with new  
21 laws. Everybody else has a lawyer in these monster, giant, lawsuits. Most of them have 20+ lawyers  
22 per side. Plaintiffs have no desire to become a lawyer. There are plenty of lawyers. If you killed all  
23 of the lawyers in one generation, there would be just as many in the next generation. Plaintiffs  
24 should be allowed to have at least one of those lawyers from the vast pool of already existing  
25 lawyers in America. This whole case is about FAIRNESS and DISCRIMINATION and REPRISAL.  
26 Defendants have people representing them that are lawyers 24/7. They just sit around and fight  
27 mobsters all day. They should be helping Plaintiffs fight mobsters and NOT fight against Plaintiffs,  
28 who is fighting the same mobsters THEY are supposed to be fighting. Defendants have an unfair

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1 advantage because they have a building full of lawyers, unlimited cash and they know all of the  
2 legal tricks and meanings of all the legal phrases which Plaintiffs have no clue about. It seems  
3 discriminatory to not let Plaintiffs have a lawyer after Defendants blocked EVERY possible way for  
4 Plaintiffs to have access to a lawyer because they fear his TRUTH and EVIDENCE. After going  
5 through all of the state-sponsored harms and hardships detailed here, and in **THE EXHIBITS**, it is  
6 not **fair**, **just** or **reasonable** for Plaintiffs to still be blockaded from having a knowledgeable legal  
7 representative. Judge Hixson is a famous and popular Judge with expert knowledge in the areas that  
8 Plaintiffs are suing over. It is not right to have Judge Hixson spend his valuable time teaching  
9 Plaintiffs lawyering 101. Just for the Judge's sake, The Court should appoint a lawyer to Plaintiffs  
10 to save the Judge time and frustration. The earlier drafts of parts of this complaint were written by  
11 White House Lawyers, The huge Reed/Rubenstein Dinsmore law firm, and government legal  
12 people. When asked about some of their top tier legal language Plaintiffs will have no clue what  
13 their citations and arguments means. Most of Plaintiffs past lawyers have been hired away by the  
14 Defendants. How are all of these circumstances not "exceptional". Plaintiffs are fighting for his  
15 rights AND for the American Public. How does he not deserve a lawyer under all of these  
16 "exceptional" circumstances? As the Judge pointed out, Plaintiffs get a free court appointed lawyer  
17 under "exceptional" circumstances. Plaintiffs have listed over 100 "exceptional" circumstances in  
18 this filing supportive of his need and right to have one and the public will always ask why the  
19 Court let Plaintiffs go on a "death march" against the biggest Defendants anyone on Earth could  
20 possibly sue without a single qualified, unconflicted, lawyer helping in. It will look like, to the  
21 public, that Plaintiffs are being "set-up" by The Defendants Cartel. If only for public optics,  
22 providing a lawyer for Plaintiffs will be best. It could be that the Court is thinking what the SF Bar  
23 and San Mateo bar representatives told him: *"Well, it will be really hard to find a lawyer around*  
24 *here who isn't in the Cartel's pocket..."* That's kind of the whole point of the lawsuit, though, isn't  
25 it. There are certainly some lawyers around who are not Silicon Valley's stooges. This is an  
26 "exceptional" circumstance.

27 Plaintiffs exhausted every possible, and impossible, option to obtain counsel as shown,  
28 below, in the detailed section of the attached **EXHIBITS**. Under "exceptional" attack by

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1 Defendants, the Defendants set out to tactially deprive Plaintiffs from getting an attorney using  
2 Government resources. This ALSO makes Plaintiffs situation “exceptional” in that few other  
3 Plaintiffs in this Court have ever had the entire resources of the U.S. government arrayed against  
4 them to try to keep them from getting justice. The Defendants are blocking Paintiff’s legal right to  
5 adequate counsel because some of them will go to prison, some will be shamed, some will lose their  
6 jobs, some will be revealed to be sex traffickers, and some will get into other kinds of trouble.  
7 Tough on them – They should not have chosen the path of evil and scum-baggery and violated the  
8 trust of every American! The new crowd-sourced global forensics technologies that Plaintiffs have  
9 freely donated to the world, on an open-source basis, will get them if this Trial does not. They  
10 should take their lickin’s now, or face all of the public later.

11  
12 **E. SPY REFERENCES:**

13  
14 Plaintiffs strongly asks the court to view the VIDEO evidence: “**HOW POLITICAL**  
15 **CORRUPTION WORKS**” (available on Plaintiffs website and at the links on the cover page) which  
16 is about the Defendants, and to read the book evidence, by Ronan Farrow, called “**CATCH AND**  
17 **KILL**”, which is about the same people and tacticts hired to “kill” Plaintiffs. IN-Q-TEL is one of the  
18 affiliated insiders and/or aggressors in this case who used ALL of the tactics, and sources, in that  
19 book. Additionally, Plaintiffs and his peers, have authored 32+ evidence books about the case which  
20 have been made available, for free, to the Court and Jury. It is not possible to deny that IN-Q-TEL,  
21 a portion of which works for Elon Musk, as confessed to by Musk, another affiliated insider and/or  
22 aggressors in this case, is not a spy agency. Plaintiffs hauled them into Court at SF Civic Center and  
23 made them admit to that other judge that they are a “SPY AGENCY”. That same day Plaintiffs  
24 walked over to 450 Golden Gate Ave, to the 13th Floor and gave a spy report to the FBI. The CIA  
25 INVENTED the phrase “*Conspiracy theorist*” and marketed it as a negative term to harm whistle-  
26 blowers. Plaintiffs have proudly helped CIA efforts as well as telling the CIA to “F\*ck Off” when  
27 they violate the U.S. Constitution on domestic soil. “We get along”, says Plaintiffs about his overall  
28 relationship with the CIA. affiliated insiders and/or aggressor: Dianne Feinstein has publicly



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1 admitted that the CIA hacked her computers (Good For Them) and she had the CIA's computers  
2 hacked. Denigrating "Spies" and calling this a 'spy story' may not show well for anybody. It is not  
3 a "CONSPIRACY THEORY" when the Plaintiffs have FACTS. There are no theories presented by  
4 Plaintiffs here. Plaintiffs have over 3 million pages of facts and hours of videos. One of Plaintiffs  
5 jobs was to build Plaintiffs patented Virtual Reality Holo-Deck for Gilman Louie. Gliman Louie  
6 created the CIA's Silicon Valley spying operation called IN-Q-TEL. IN-Q-TEL is covertly financed  
7 by the UNITED STATES. Plaintiffs have previously sued IN-Q-TEL for stealing Plaintiffs  
8 technology and not paying Plaintiffs, after IN-Q-TEL and another new American "Foundation" had  
9 become a rogue domestic spy operation with zero Congressional oversight. Plaintiffs was involved  
10 with Stanford Research Institute (SRI) on the "STARGATE" project. It is now WIDELY exposed  
11 in the mainstream news, and common knowledge, that SRI was a CIA operation. The  
12 "STARGATE" program even has it's own Wikipedia page these days. There ARE spies and SPY  
13 AGENCIES and ROGUE SPY operatives and Plaintiffs who may have been ex-'spies' for the IC in  
14 this case. 'SPIES' are **not** bad people if they are catching the bombers. They **are** bad people if they  
15 are using CIA and/or NSA domestic databases to stalk ex-girlfriends or get stock market tips! The  
16 Court and Defendants should seek to not use negative references to the word "SPY" except when it  
17 comes to Black Cube and Fusion GPS.

18  
19 ***F. IMMUNITY OF OFFICIALS:***

20 Government officials no longer have the immunity they once thought they had. Plaintiffs  
21 STOCK ACT in Congress proves part of that assertion as the STOCK ACT punishes most  
22 government officials for doing the crimes Plaintiffs asserts. Also, Plaintiffs created a legal  
23 Precedent by suing the Acting Secretary of Energy. Steven Chu and Lachlan Seward said they had  
24 "Qualified immunity", yet Plaintiffs got them kicked to the curb. That's a "win" for Plaintiffs AND  
25 the taxpayers! He and his investors sued Steven Chu, The Secretary of Energy, The U.S. and other  
26 government officials and got them fired for corruption. Other recent cases prove that dirty  
27 politicians will always, now be taken down, either in, or around the Court. To dismiss Plaintiffs  
28 case may discourage the public that nobody can get justice and may make the world say: "See, they

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ran another reprisal on him...it's Seth Rich all over again". .."there is no justice.." "Everybody that tries to DO THE RIGHT THING gets screwed by Uncle Sam.." etc. Give the people some hope and don't let this case get dismissed. EVERYBODY said: "*You can't sue the Secretary of Energy personally and get him kicked out*" Plaintiffs did it! There are hundreds of things Plaintiffs was told were "IMPOSSIBLE.." and Plaintiffs still pulled them off. Look at Plaintiffs resume website, who else do you know that has been so productive against such impossible odds? It would be a crime to dismiss a public-interest lawsuit designed to stop corruption against the public! Plaintiffs set new legal precedents which make it easier to sue public officials and hundreds of public service groups are now doing the same thing. Did you notice that 35+ Congressional members just decided to up and quit Congress just prior to the upcoming election? That is from these new "immunity reduction" efforts targeting crooks working in Plaintiffs government. Crooked officials can no longer put their dirty eggs in the "but I'm immune.." basket. Google-Alphabet-YouTube will, likely, trot out their old ploy: "*...but we work for the CIA, see all these secret wire trasnfers we get from the government..and.... and, the CIA funded us.. We are IMMUNE*" BS!! Micheal Painter can testify about who paid for Google Maps and their sateliite sysem: The American Taxpayer! Nearly 500 ex-employees are prepared to come forward and testify to what Google REALLY is. The one thing that Google, and the other co-conspirators, are NOT is immune! Eric Schmidt, Larry Page and Elon Musk, as covert operators of the deep state within the U.S., have no such immunity. The FBI AND Plaintiffs both have the evidence, training, credentialing and rapid ability to produce arrest documents for any party listed herein and those Defendant bad actors MUST be arrested and charged. Mobsters in the U.S. government engaged in RICO violations and organized crime are NOT immune from prosecution!

***G. DOJ – REQUEST TO JOIN CASE AS CO-Plaintiffs:***

Plaintiffs continues to request Stephanie Hinds and Michelle Lo (Counsel for Defendant AND Beneficiaries of Plaintiffs Whistle-blowing, thus: 'Frenemies') at DOJ to join the case for the RICO and other crime charges. He has asked them to join FBI super-agent Peter D. Cair to assist in

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1 that RICO case. In any case, during trial, Famous FBI Agents Peter D. Cair and David Johnson  
2 (who Plaintiffs have always addressed his reports and evidence materials to) will be requested to  
3 testify relative to RICO and Big Tech organized crime in Silicon Valley and Washington, DC.  
4 Plaintiffs hereby reaffirms that part of this case involves RICO violations by White House Staff,  
5 U.S. Senators and Silicon Valley oligarchs who conspired as an “*ENTERPRISE*”. Under 18 U.S.C.  
6 &1964(c) Plaintiffs alleges conduct of an enterprise witnessed by Plaintiffs and his associates  
7 proving a pattern of racketeering activity (known as ‘predicate acts’) which caused severe injury to  
8 Plaintiffs life, business and property. Per “*Abcarian v. Levine*, 972 F .3d 1019, 1027 (9th Circ.  
9 2020).” Plaintiffs in his evidence and EXHIBITS has shown and does hereby swear, warrant and  
10 certify that the RICO violations proximately caused many injuries to Plaintiffs business and  
11 property including putting his companies out of business because Plaintiffs did not pay into  
12 Defendants Protection Racket. “ *Thomas v. Baca*, 308 Fed, Appx. 87, 88 (9th Cir. 2009)

13  
14 **H. CO-CONSPIRATOR CLARIFICATION:**

15  
16 The Court asks Plaintiffs to, at this time, indentify other potential defendants but Plaintiffs  
17 are limited to do so as the testimony, in trial, by FBI, DOJ, FTC, SEC, Private investigators and  
18 Congressional investigators will finalize those names. To name them now in more detail would  
19 require risk-of-life and financial loss that would destroy Plaintiffs and could affect outside active  
20 investigations. For Example, one of those ‘enterprise’ RICO partners is thought to be  
21 Google/Alphabet and their sub-Cartel. Currently being sued by the U.S. in a variety of lawsuits for  
22 dirty deeds. Some of those lawsuits were promoted into existence by Plaintiffs. Plaintiffs also sued  
23 (Crime Empire) Google/Alphabet in this very Court building. Their lawyers: Wilson Sonsini, and  
24 the executives told Plaintiffs: “*If you don’t pull this Complaint right this instant we will end your*  
25 *life and bankrupt you almost overnight.*” Gary D. Conley told Plaintiffs that Google’s executives:  
26 Larry Page and Eric Schmidt were going to have him killed for whistle-blowing. Gary was soon  
27 found in a field behind Beal Air Force Base in Northern California with a bullet in his head. His  
28 family said he would never harm himself. Beal is where most of the nukes are kept so it is

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1 surrounded by video cameras. Strangely, the videos of that night have gone “missing”. Gary could  
 2 not have stolen the tapes after he was dead. Plaintiffs asked California Attorney General Kamala  
 3 Harris to look into Gary’s death but she refused because she knew it would lead straight back to her  
 4 financiers in “The Paypal Mafia”. Rajeev Motwani told Plaintiffs he was worried about his  
 5 relationship with the founders of Google. Then he was also found dead, face down, in his Silicon  
 6 Valley swimming pool from a synthesized cardiac arrest. The list goes on for 20 pages of real  
 7 frightening reasons why the other RICO participants can’t be named today, but will be named later,  
 8 and by federal officers. Since the court offers no witness protection to the Plaintiffs and it is said  
 9 that Plaintiffs will “*be shot to on his way to or from the court room*”, there are many reasons to not  
 10 name the other Enterprise players in the Complaint header **at this time**. All of their possible names  
 11 are already listed in the **attached EXHIBITS** that were submitted with the original filing. Plaintiffs  
 12 feels certain that the Court, all Jury Members and any other American person knows exactly who  
 13 “*The Silicon Valley Oligarchs*” , “*The Paypal Mafia*” and “*NVCA*” are. They are all detailed in the  
 14 related cases: SFPD Case # **150528148** ( - Company E (Northern District) Per Officer Liu – Badge  
 15 # 4742 ) is relevant. Police incident report # **25119268** is relevant. OSC Case File No. **MA-19-**  
 16 **002006** is relevant. OSC Case File **DI-15-4541** is relevant. California Victim Compensation &  
 17 Government Claims Board Claim # **G628261** is relevant. Also relevant are: Case No. **1:20-cv-**  
 18 **03010** ( Google monopoly and competitor attacks case); Case No. **11-CV-2509** (  
 19 <https://www.cand.uscourts.gov/judges/koh-lucy-h-lhk/in-re-high-tech-employee-antitrust-litigation/>  
 20 ); Task force Case No. **20-xyz2020a** ( <http://www.case-xyz2020a.com/> ); Case No. **20-03664** (  
 21 <https://www.insurancejournal.com/app/uploads/2020/06/brown-v-google.pdf> ); Case No. **1:12-CV-**  
 22 **00774-mms** and related cases. ( [https://thehill.com/blogs/congress-blog/the-administration/250109-](https://thehill.com/blogs/congress-blog/the-administration/250109-a-case-study-in-pay-to-play-cronyism)  
 23 [a-case-study-in-pay-to-play-cronyism](https://thehill.com/blogs/congress-blog/the-administration/250109-a-case-study-in-pay-to-play-cronyism). Criminal referrals against the attackers have been filed with  
 24 the FBI, DOJ, SEC, FEC, FTC ); Case No. **18-cv-8865** (S.D.N.Y.)(SEC v. Elon Musk for lies and  
 25 scams ); Case No. **18-cv-8947** (S.D.N.Y.)( SEC v. Tesla, Inc. for lies and scams ); Case No. **1:14-**  
 26 **cv-270143** ( Google racketeering charges - [https://artistrightswatch.com/2017/10/08/googles-](https://artistrightswatch.com/2017/10/08/googles-racketeering-challenge/)  
 27 [racketeering-challenge/](https://artistrightswatch.com/2017/10/08/googles-racketeering-challenge/) ); Case No. **1:19-cr-00490** ( United States v. Epstein - Big tech sex cult  
 28 crimes case ); Case No. **129 So.3d 1196** (Fla. 2d DCA 2014); 170 So.3d 125 (Fla. 2d DCA 2015)

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( Gawker Media, LLC v. Bollea in which Gawker, Deadspin, Gizmodo, Jalopnik, Jezebel, Kotaku and Lifehacker were exposed as character assassination and money-laundering fronts working for notorious third parties); Case No. **19-cv-343672** James Martin (on behalf of ALPHABET INC) v Larry Page et al (Sex Cults In Silicon Valley ); Case No. **CGC-11-508414**, California Superior Court, San Francisco (Plaintiffs v Google ); **Case No. 3:16-cv-03061 U.S. DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA, San Francisco Division ( Plaintiffs V. Google/Alphabet/YouTube)**; Case No. **18-CIV05380** Rubin Vs. Rubin (Google sex cult and sex slave charges ); Case No. : **1:17 - cv - 06404** Vs. Rubin (Organized crime sex trafficking stock market manipulators ); Case No. D.C. No. **3:17-cv-05369** - VC (Big tech harassment of outsiders);Case No. **3:21-cv-00077** (Another of many lawsuits proving that the Silicon Valley Cartel conspires to manipulate media and markets) and the SFPD Roger Boas case records. David Drummond, Elon Musk, Larry Page, Eric Schmidt, David Rubin, and other, oligarchs advised and, literally, ran the White House, were charged with sex trafficking by their spouses, tax evasion by the IRS, money laundering by FINCEN, DOJ, INTERPOL, or other agencies. They ran the White House to such a degree that many news reports stated that “*you couldn’t swing a cat at the White House without hitting a Google or Facebook insider.*” ( ie: The Intercept – The Google Administration) The U.S. sought, solicited, encouraged, paid, traded influence and web services with these known mobsters of the tech industry and gave these sociopaths full credentials and authority under the U.S.

***I. LIABILITY OF DEFENDANTS:***

For over a decade, the U.S. had full and complete evidence to arrest the Cartel members referenced herein yet the U.S. did not arrest them because they were “*friends of the White House*” and they kept the pig trough of insider trading and crony capitalism flowing like a tsunami of skull-duggery. Thus the U.S. is responsible for all harms and damages to Plaintiffs in addition to the other reasons mentioned, herein, as to why the U. S. must pay Plaintiffs. On top of that, The U.S. sponsored, operated, financed and provided the taxpayer-paid resources to harm Plaintiffs. The

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1 government argument that “...oh, that was just all that crazy Eric Schmidt, Elon Musk and Larry  
2 Page and Zuckerberg doing all that stuff.. they are just insane little frat house boyfriends that are  
3 out-of-control...” , does not hold water based on the facts herein. The U.S. had direct financing and  
4 command-and-control executive management over all of the harms against Plaintiffs. In fact, top  
5 FBI, DOJ, SEC, FTC, CIA and other investigative officers have quit their agencies over this crony  
6 favoritism and failure to arrest. On March 22, 2022 in a related case, # **1:21-mc-00813-AT in U.S.**  
7 **District Court, Southern Division New York;** Paul A. Calli and Charles P. Short, lawyers for the  
8 Plaintiffs filed a letter of the same date, provided in the EXHIBITS. In that letter to Honorable  
9 Judge Analisa Torres and in related national news articles, it has been revealed that the DOJ lied to,  
10 and concealed facts and evidence from the Judge. This is of concern as Plaintiffs, is also a reporter  
11 and nationally published news publisher. On the same day, and at nearly the same time DOJ leaked  
12 **government exhibit #3217 (GX 3217)** which was admitted **under seal**, This leaked evidence  
13 provided the names of 121 famous sex cult participants in the U.S. v. Ray sex cult case. The news  
14 organizations of the world have now published that list. It seems that someone at DOJ is trying to  
15 help Plaintiffs case, while others at DOJ are trying to harm Plaintiffs. These two recent occurrences  
16 further prove two of Plaintiffs claims:

17 1. That government officials hack citizens simply in reprisal and lie to Judges about it. In  
18 that other case, simply because some girl lost her diary.

19 2. That an active and ‘Deep State’ sex cult exists nationwide. That affiliated insiders operate  
20 and sex traffick in it and the government is fully aware of it.

21 The Defendants are 100% liable for the charges herein and for the harms to Plaintiffs listed  
22 herein.

### 23 **STATEMENT OF FACTS**

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***“Political ‘bad guys’ kill people to control this multi-trillion dollar energy market...”***

**- Goldman Sachs**

# EVERY FEW MINUTES SOMEONE IS MURDERED FOR LESS THAN 50 DOLLARS

## Afghanistan: The Saudi Arabia of Lithium?

**Lithium, which is from mobile phone nation's economy.**

By JAMES RISEN  
Published: June 13, 2010

WASHINGTON — The United States has discovered nearly \$1 trillion in untapped mineral deposits in Afghanistan, far beyond any previously known reserves and enough to fundamentally alter the loan to Think Global, which is trying to emerge from bankruptcy — is held by Bzinfan, a British Virgin Islands company whose "indirect beneficial owner" is Boris Zingarevich, a Russian businessman. Zingarevich has close ties to Russian President Dmitry Medvedev and Prime Minister Vladimir Putin.

## Investing in Lithium Mining Stocks

**How To Profit from the Lithium Boom**

By Brian Hicks  
Friday, October 16th, 2009

Editor's Note:

While Western Lithium remains trades — and possibly a third — opportunity to double if not triple

Energy & Genius

## The Saudi Arabia of Lithium

Brendan I. Koerner, 10.30.08, 06:00 PM EST  
Forbes Magazine dated November 24, 2008

The gas engine made petroleum the world's biggest commodity. The electric car could do the same for the third element on the

## Green power corrupts

Share Tweet Stumble

U.S. Identifies Vast Mineral Riches in Afghanistan

Goldman Sachs culture 'toxic'? Letter confirms suspicions about Wall Street.

A123 lithium-ion battery maker bankruptcy fuels criticism of President Barack Obama's alternative

Enel Wants to Win Lithium Ion Battery Race

Share Tweet Stumble

U.S. Identifies Vast Mineral Riches in Afghanistan

Goldman Sachs discloses ownership in Talison Lithium Corp.

Talison Lithium Corp.

Lithium ion battery manufacturer Enel (HEV) could become the country's first lithium ion battery mass producer—if it wins a \$480M Department of Energy loan. CNSMoney has more.

## The problem with lithium

David Booth, National Post

chloride ring SCM creating the illud the ultra-arid sala

Image: Corbis

Lithium ion battery manufacturer Enel (HEV) could become the country's first lithium ion battery mass producer—if it wins a \$480M Department of Energy loan. CNSMoney has more.

**THIS IS THE "PITCH BOOK" THAT USAID USED TO SELL AN AFGHAN WAR TO THE AMERICAN VENTURE CAPITAL OLIGARCHS FOR THEIR CELL PHONE AND TESLA BATTERY DEALS!**

Afghanistan is sitting on mineral wealth worth over \$3 trillion and its future depends on it

Alshay News 10 July 2009 South Asia

## U.S. Identifies Vast Mineral Riches in Afghanistan

## The New Oil: Afghanistans Lithium Mines worth Trillions of Dollars

Posted: March 15, 2011 in All Articles / Posts, Main Stream Media Omission, US Foreign Policy

Tags: afghanistan, china, cobalt, concessions, copper, foreign investments, ghazni, gold, karzai, lithium, minerals, mines, mining, war

## WORLD'S MINING COMPANIES COVET AFGHAN RICHES

By JAMES RISEN Published: June 17, 2010

<http://www.nytimes.com/2010/06/18/world/asia/18mines.html>

A few high-risk investors are sufficiently intrigued by the country's potential to take an early look. JP Morgan, for instance, has just sent a team of mining experts to Afghanistan to examine possible



**WHAT DO YOU THINK CRAZY  
POLITICIANS AND BILLIONAIRE  
OLIGARCHS WOULD DO TO STEAL  
SIX TRILLION DOLLARS**

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Plaintiffs are a ‘whistle-blower’ in a national anti-corruption matter herein referred to as “CASE X”, (which is **not** this case) which involves the Afghan War, energy, mining and telecom contracts, using the stock market for political payola and insider trading. Plaintiffs had regular employment from 1960 to 2007 as a Program Director, Inventor, Product Architect and Congressional Advisor with a ‘side job’ as an investigator. Plaintiffs have a massive number of letters of commendation from The White House, Congress, major business leaders and well known executives, on Plaintiffs resume website at <https://www.majestic111.com> . The case evidence examples for this case are located at <https://san-francisco-news.com> where one can view, at least, 300,000 evidence documents and evidence videos verifying the assertions herein.





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1  
2 The United States Patent Office (<https://uspto.gov>) has awarded Plaintiffs dozens of seminal  
3 issued patents as first-to-invent the core technologies, of modern Silicon Valley, years before  
4 Defendants sinister company partners even existed. Billions of people use Plaintiffs technologies  
5 worldwide.

6 Who hasn't ordered a high-definition movie on the internet, on-demand, and watched it in  
7 full-screen, full-color, on the web? ***The United States Patent Office and public records say one of***  
8 ***Plaintiffs company's did it first!***

9 Who hasn't enjoyed social networking on the web. ***The United States Patent Office and***  
10 ***public records say one of Plaintiffs company's did it first*** and the USPTO hearing that occurred  
11 said that Plaintiffs did it BEFORE Zuckerberg or Yahoo engineers had thought of it!

12 Who hasn't experienced immersive virtual reality in a fantastic synthetic computerized  
13 world. ***The United States Patent Office and public records say one of Plaintiffs company's did it***  
14 ***first!***

15 Who has hasn't dreamed of an electric car that can solve all of America's energy problems,  
16 gets all of it's fuel from clean sources INSIDE of America, is the safest car ever made, is affordable  
17 to the average person and relies on no foreign sourcing? ***The United States Patent Office and***  
18 ***public records say one of Plaintiffs company's did it first!*** ...AND, on top of that, Plaintiffs was  
19 awarded nearly a billion dollars of issued patents in commendation by the government. ...AND on  
20 top of that, Congress awarded Plaintiffs a Congressional award for it in The Iraq War Bill ...AND  
21 The United States Government contracted Plaintiffs to build it..... BUT then the U.S. Government  
22 sabotaged the whole thing, including all the patents and the rest of Plaintiffs funding because it was  
23 about to obsolete their insider's car: The deadly, stock market pump-and-dumped and contrived  
24 "Tesla". Law enforcement and news investigators then informed Plaintiffs he had been defrauded  
25 by a government scam and insider crony slush-fund.

26 There are a vast volume of other similar examples of "Firsts" created and placed on the  
27 market by Plaintiffs and then spied-on, stolen and copied By Defendants who then launched harms  
28 against because Plaintiffs refused to participate in their protection rackets.

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1 Defendants broke RICO laws by, in part, attacking and destroying Plaintiffs companies  
2 because he did not participate in Defendants protection rackets and because his products and  
3 technologies obsoleted theirs.

4 Defendants spied on Plaintiffs companies (with honey-traps, listening devices that were  
5 found, hacked servers, Microsoft Outlook email re-directs, moles who actually worked for the  
6 Defendants and other tricks), copied the patents, technologies and trade secrets and made hundreds  
7 of billions of dollars from them. Defendants blockade Plaintiffs from getting a law firm, as detailed  
8 in the attached and hot-linked **EXHIBITS** and blockade his litigation attempts to get to Jury Trial  
9 against him. There is even a New York Times expose' article about how Google boss: Larry Page  
10 ('boyfriend' of Elon Musk – They share an apartment, lobbyists and own the same Senators), skulks  
11 around at tech events stealing ideas for Google/Alphabet. Page stole many of Google's technologies  
12 from Plaintiffs. It is difficult for Plaintiffs to watch Defendants buy mutiple homes, race cars,  
13 private islands, private jets, celebrity parties, exotic resort vacations and other fine things, based on  
14 profits from Plaintiffs inventions, while Plaintiffs are allowed to have none of these things, and is  
15 blockaded from even getting a single home, because Defendants Cartel 'Enterprise' won't allow  
16 him to. In full compliance with RICO requirements, Defendants attacked Plaintiffs A.) Record-  
17 breaking Global Televsion Network, B.) Energy Processing Company, C.) Electric Vehicle  
18 Manufacturing Company, D.) Social Media company and harrassed, black-listed, and put them out  
19 of business because they had products that Defendants copied and Plaintiffs had them years Before  
20 Defendants efforts even existed. The fact that those harms occurred requires that RICO be enacted  
21 according to law. Plaintiffs family organized the authoring and signing of THE DECLARATION  
22 OF GOVERNMENT on 11/11/1620 at Plymouth Rock, MA and traveled to America on the  
23 Mayflower. Some law scholars state that this "created the U.S. Government".

24 Plaintiffs requests that the court watch the videos that have been made about this case,  
25 supplied by Plaintiffs on a thumbdrive or streaming on Plaintiffs website, as they provide crucial  
26 third party evidence and testimony.

27 In the CASE X matter, the United States agencies, university and news reports have stated  
28 that the United States and it's taxpayers lost tens of billions of dollars.



**THE UNITED STATES OF AMERICA OWES Plaintiffs MONEY FOR SAVING  
THE UNITED STATES OF AMERICA MONEY**

*If not for the actions of Plaintiffs, they would have lost tens of billions of dollars more.  
Plaintiffs are OWED some consideration for serving his nation, overtly and covertly, and getting  
attcked and harmed for it by reprisal-oriented corrupt government officials who got caught!*

Verifications and proofs of all assertions are provided in the attached **EXHIBITS**.

Plaintiffs, and his co-investors, previously sued the U.S. for political reprisal and won their  
(massivly media covered) case under (Supreme Court nominee) Judge [Ketanji Brown Jackson](#),  
wherein Plaintiffs and his peers ***proved that political reprisal hit-jobs had been ordered against  
Plaintiffs*** by Executives in The White House, The Department of Energy and via at least three West  
Coast U.S. Senators, all of whom had hundreds of millions of dollars of ‘unjust gains’ expected  
from their illicit participations in CASE X and the stock market gains they sought therefrom. The  
Secretary of Energy, Mutiple Attorney General’s and the Director of the FBI were fired for  
corruption during the CASE X timeframe and according to law-firm Covington And Burling, who  
claims (in emails to Plaintiffs) to have placed those appointees in office, they were all connected to  
CASE X ill-gotten gains. ***Plaintiffs exposure of the crimes, notifications to the perpetrators that  
they had been caught, lock-down of the loop-holes used to engage in the crimes, creation of  
massive press coverage of the corruptions, creation of legal precedents, mass posting of the  
evidence to citizens world-wide, and other efforts, is said to have saved the United States Of  
America over \$200 Billion dollars in losses from future and ongoing versions of these crimes.***

**DETAILS OF HARMS TO Plaintiffs BY DEFENDANTS**

In 2007 and 2008, Plaintiffs applied for SSDI and a HUD home certificate. In 2008, SSA  
stated that all 19 disabling conditions existed but that Plaintiffs must confirm they will last more

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1 than a year. Plaintiffs SSDI and HUD certificate were blockaded by public officials in reprisal for  
2 Plaintiffs helping law enforcement in the CASE X matter.

3 From, at least, 2007, forward, Plaintiffs was reporting to law enforcement and regulatory  
4 officials about CASE X, the previously noted national anti-corruption matter.

5 In 2008, contractors from The White House and California Senators, all of whom have vast  
6 documented court and news report records of hiring attackers from spy agencies for reprisal attacks  
7 on whistle-blowers, used their resources to stop all funding in Plaintiffs SSDI funding as reprisal for  
8 whistle-blowing. They got SSA to say that Plaintiffs WAS permanently disabled, but that because  
9 he could not work, he lost his SSA credits waiting the one year and one day that SSA required to  
10 prove that his disabilities would last longer than a year. Dianne Feinsteins own staff and family, who  
11 had cohabitated with Plaintiffs, confessed to these 'dirty-tricks' actions as reprisal for Plaintiffs  
12 testimony accidentally cutting off \$120 million+ of potential profit the family expected in "CASE  
13 X". Her staff have been exposed by CIA staff as *"the masters of dirty tricks reprisals...even as good  
14 as the ones we (THE CIA) pull off.."*

15 In 2007 Plaintiffs applied for his HUD Mortgage coupon. It is now 2022 and he still has not  
16 received it after over 100 inquiries as to the status. City and County officials have stated that they  
17 have "never seen it take so long". According to all experts, the only way it could have been stone-  
18 walled this long is if a public official had ordered it slow-walked as part of the political reprisal  
19 attacks on Plaintiffs. Three different counties have checked on this and said that Plaintiffs records  
20 'went missing' in a Lois Lerner type of error set.

21 *The cut-off of Plaintiffs finances and benefits coincides, exactly, with his whistle-blower*  
22 *testimony AND to the reprisal threats and promises by THE ONLY PEOPLE IN THE WORLD*  
23 *capable of accomplishing such state-sponsored attacks. Defendants were the only entity with the*  
24 *means, the motivation and the proven history of such actions on a regular historical basis.*

25 *Feinstein's current and former staff members (See the Dossier on Daniel Jones) (See the*  
26 *fact that Plaintiffs lived with, dined with and partied with her family and senior staff) have stated*  
27 *that the Feinstein and Pelosi offices commonly order citizens government funding to be cut off as*  
28 *political reprisal. The White does it almost every other day. In this case they did it to Plaintiffs at*

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1 *least three times.*

2 Feinstein's cross-hacking battle with the CIA exposed the fact that the CIA had charged her  
3 with larceny. Later, she was found to have top-level Chinese spies in her office and that her staff  
4 hired Fusion GPS, Black Cube and other "hit job" services on a regular basis. Feinstein is widely  
5 known for hiring disgruntled ex-CIA staff to do her dirty work for her. Congressmen Devin Nunes,  
6 Trey Gowdy and 30+ others referred to her as "The most corrupt insider trading scheme maker"  
7 they ever encountered. If you type: "**Dianne Feinstein Corruption**" in the top 5 search engines in  
8 the world, the corruption articles results go on for longer than any other politician in history.  
9 Feinstein's family fund is also business partnered with Elon Musk, who Plaintiffs have testified to  
10 the FBI about. Feinstein's Chief Of Staff threatened Plaintiffs with retribution, in writing, if  
11 Plaintiffs moved forward with the recovery of the NUMMI factory in Fremont, California, after  
12 Elon Musk said he "had no possible use for it", on TV. Covertly, the Feinstein family had talked  
13 Musk into taking the building [because Feinstein's family managed it](#). They owned the front  
14 companies for FBI-raided Solyndra and under-investigation Tesla. Feinstein's staff claimed to be  
15 able to **"kill off any federal funding, SSA benefits, HUD funds or other government funds WITH**  
16 **A SINGLE PHONE CALL, if someone 'pissed them off'.**" Dianne Feinstein's daughter: Judge  
17 Kathy Feinstein used to stay overnight at Plaintiffs house and party in the hot-tub in the back yard  
18 and tell stories. Plaintiffs also lived at the apartment of Diane Feinstein's office director, Helen and  
19 spoke with Dianne Feinstein's family members, including her husband and his business partners, on  
20 many occasions. It is reasonable to think that Plaintiffs have 'inside knowledge' about many  
21 political and financial situations. Dianne and Kathy Feinstein used to write these kinds of glowing  
22 City Hall proclamations about Plaintiffs:

Pg 67 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSHOFFICE OF THE MAYOR  
SAN FRANCISCO

DIANNE FEINSTEIN

On behalf of the people of the City and County of San Francisco, it is a pleasure to send greetings and warm good wishes to Mr. Scott Redmond on the occasion of the presentation of his innovative art project entitled "Lights," which is scheduled to take place on January 28 and 31, 1979, and which promises to be a unique artistic experience for residents of the Bay Area.

"Lights" has been conceived and will be executed as a dazzling, massive display of outdoor lighting effects intended to produce a fantasy of colorful illumination in the skies above San Francisco. The production will emanate from the heights of Twin Peaks, sending brilliant shafts of illumination upward, and it will be visible to residents of San Francisco, Oakland and Berkeley. Synchronized with the optical effect of the performance, a special musical accompaniment will also be presented over Radio Station KYA-AM/FM. To obtain the optimum effect of the entire production as conceived by the artist, the Bay Area audience is invited to simultaneously enjoy this integral aspect of the performance.

As Mayor of San Francisco, I am pleased to have this opportunity to acknowledge the artistic efforts of Scott Redmond, and to congratulate and thank him and all his assisting artists and technicians, who are participating in bring this enterprise to fruition. We are also grateful to Radio Station KYA-AM/FM and the many other sponsors whose assistance and interest have made this project possible. The people of San Francisco and the Bay Area look forward with pleasure to the presentation of "Lights" as an unusual and exciting entertainment event.

"Lights" has been conceived and will be executed as a dazzling, massive display of outdoor lighting effects intended to produce a fantasy of colorful illumination in the skies above San Francisco. The production will emanate from the heights of Twin Peaks, sending brilliant shafts of illumination upward, and it will be visible to residents of San Francisco, Oakland and Berkeley. Synchronized with the optical effect of the performance, a special musical accompaniment will also be presented over Radio Station KYA-AM/FM. To obtain the optimum effect of the entire production as conceived by the artist, the Bay Area audience is invited to simultaneously enjoy this integral aspect of the performance.



*Dianne Feinstein*  
Dianne Feinstein  
Mayor



*Dianne Feinstein*  
Dianne Feinstein  
Mayor



*Figure 4: Plaintiffs, Warren Buffet, Monica Lewinsky's Boss And Hillary Clinton*



Feinstein became the financier, co-owner and ‘lobbyist’ for Elon Musk, One of Plaintiffs biggest competitors. As of 2022, though, Musk has been charged by almost every government agency with various illicit actions. Plaintiffs have testified to most of those agencies. It is VERY clear that public officials put hit-jobs on Plaintiffs using government resources.



# Elon Musk proves that no government officials can stop his crimes and corruption

Jeremy C. Owens,

Claudia Assis and

Max A. Cherney

–

**Local California officials worked to ensure Tesla's Fremont facility reopened with proper safety guidelines amid public pressure from carmaker's celebrity CEO, emails show**



**Fremont, Calif., Police chief Kimberly Petersen, left, worked with Alameda County Public Health officials to ensure the Tesla factory in her city reopened safely as Tesla Chief Executive Elon Musk, right, took the fight to Twitter.**

MarketWatch photo illustration/Cetty Images. Fremont Police

# San Francisco's Corruption Culture



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1           Reknown investigator Jack Palladino acquired a large portfolio of documents about Bay  
2 Area politicians involved in bribery, sex trafficking and sex abuse. In a career that spanned nearly  
3 50 years, Palladino became known for taking on high-profile and controversial cases. The [San](#)  
4 [Francisco Examiner](#) noted in 1999 that he had "built a reputation for aggressive investigations, an  
5 in-your-face style and the ability to neutralize adverse witnesses and spin hostile media."[\[7\]](#) With  
6 Sutherland, he investigated fraud, personal injury, medical malpractice and murder cases.[\[6\]](#) He was  
7 both a friend and enemy to Plaintiffs. He revealed key facts and evidence to Plaintiffs, yet also may  
8 have been later hired to assist in the political reprisal "hit-job" on Plaintiffs.

9           While still in law school at [University of California, Berkeley](#), Palladino was hired by the  
10 family of Patty Hearst to assist in the matter of her 1974 kidnapping by the [Symbionese Liberation](#)  
11 [Army](#) (SLA).[\[3\]](#) He also spent seven years investigating the [Peoples Temple](#) tragedy, a.k.a.  
12 Jonestown, in which more than 900 members of a religious cult died in [Guyana](#) in 1978. His  
13 interviews with surviving members of the cult and their families are now part of the definitive  
14 history of that event.[\[4\]](#) When Plaintiffs worked for the Hearst's at the San Francisco Examiner, he  
15 often visited the small building, across the alley from the main San Francisco Examiner building  
16 where all of the Patty Hearst file boxes and FBI documents were kept.

17  
18           In 1982, [John DeLorean](#), a former [General Motors](#) executive who had formed the  
19 independent [DeLorean Motor Company](#), was charged with engaging in a cocaine trafficking deal to  
20 fund his company. Palladino & Sutherland interviewed more than two hundred witnesses in a  
21 defense that convinced the jury to acquit DeLorean based on entrapment by government agents.[\[3\]](#)

22           Palladino was perhaps best known for being hired by the [Bill Clinton](#) presidential election  
23 committee to challenge a campaign intended to deny Clinton the Democratic nomination.  
24 Palladino's work included discrediting women with whom Clinton supposedly had been intimate,  
25 according to [Newsweek](#) magazine.[\[8\]](#) The Clinton election committee reportedly paid Palladino  
26 more than \$100,000 over several years to investigate two dozen women in a damage control  
27 inquiry. [Michael Isikoff](#) claimed the Clinton campaign used deception regarding the payments. He  
28 said the payouts came from campaign funds, but were listed as legal fees paid to a Denver law firm

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1 rather than payments to Palladino. He further claimed that Clinton's chief of staff [Betsey Wright](#)  
2 later told him the funds were for "controlling bimbo eruptions".[\[9\]](#)

3  
4 Palladino was also employed by singer [Courtney Love](#) to talk to journalists investigating  
5 whether she was involved in the 1994 death of her husband, singer [Kurt Cobain](#). Palladino insisted  
6 he was never involved in "fear and intimidation" in his investigations and production of dossiers on  
7 such journalists.[\[10\]](#)

8 When former tobacco executive [Jeffrey Wigand](#) began cooperating with [60 Minutes](#) on  
9 insider revelations of tobacco company manipulations designed to increase smoker addiction, the  
10 industry launched a million dollar public relations campaign to discredit him. Palladino engaged in  
11 a counter-investigation that turned the spotlight onto this smear campaign and preserved Wigand's  
12 credibility as an expert witness in a lawsuit that subsequently resulted in a more than two hundred  
13 billion dollar settlement, in the first successful litigation against Big Tobacco.[\[2\]](#) This effort is  
14 chronicled in [Marie Brenner](#)'s May 1996 [Vanity Fair](#) article "The Man Who Knew Too Much"[\[11\]](#)  
15 and in the 1999 [Michael Mann](#) film [The Insider](#). In that movie, Palladino appeared as himself,[\[12\]](#)  
16 and his partner, Sandra Sutherland, was played by actress Megan Odebash.[\[13\]](#)

17  
18 In 2002, singer, songwriter, and record producer [R. Kelly](#) was charged with videotaping  
19 himself having sex with an underage teenage girl. An investigation by Palladino that lasted six years  
20 culminated in Palladino's testimony at trial challenging the principal prosecution witness, and the  
21 acquittal of Kelly in less than a day.[\[14\]](#)

22 In April 2009, Australian businessman [Peter Holmes à Court](#) admitted in the [Supreme Court](#)  
23 [of New South Wales](#) that the Hollywood actor [Russell Crowe](#) had hired Palladino & Sutherland to  
24 investigate opposition to the planned takeover of the [South Sydney Rabbitohs](#).[\[15\]](#) Crowe had first  
25 gotten to know Palladino and his Australian wife and partner, Sandra Sutherland, when all three  
26 worked on the film [The Insider](#).[\[16\]\[17\]](#)

27  
28 [Ronan Farrow](#) reported in November 2017 that [Harvey Weinstein](#) had, through the lawyer



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1 [David Boies](#), employed the private intelligence agencies [Kroll Inc.](#), [Black Cube](#) and private  
2 investigator Jack Palladino to spy on and influence Weinstein's [alleged victims](#) as well as reporters  
3 who were investigating Weinstein, in order to prevent his conduct from becoming public.[\[18\]](#)[\[19\]](#)

4  
5 Other notable clients included [Don Johnson](#), [Kevin Costner](#), [Robin Williams](#), [Huey P.](#)  
6 [Newton](#), the [Hells Angels](#) and [Snoop Dogg](#).[\[20\]](#) . Palladino acquired the following documents. The  
7 validity of these documents must be verified by SFPD and the FBI:  
8  
9  
10  
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INCIDENT REPORT FORM										SAN FRANCISCO POLICE DEPARTMENT									
INCIDENT NO. 151199268										363									
<input checked="" type="checkbox"/> INITIAL <input type="checkbox"/> SUPPLEMENTARY <input type="checkbox"/> BOOKED <input type="checkbox"/> CITED										DOMESTIC VIOLENCE YES NO STATEMENT TAKEN YES NO ASSIGNED (RECORD ROOM USE ONLY) Intelligence									
TYPE OF INCIDENT MISSING PERSON (Found)										M.O. CODE 1N6									
DATE & TIME REPORTED TO POLICE 11-05-85 1430 HRS										DATE(S) & TIME(S) OF OCCURRENCE 11-05-85 1330 HRS									
LOCATION OF OCCURRENCE 30-16TH AVE										LOCATION SENT TO									
REPORTING OFFICER James Gulland 1918										REPORT APPROVED BY [Signature] 647									
VICTIM CODES: V - VICTIM; R - REPORTEE; W - WITNESS; P - PARENT; N - NOTIFY; F - FOUND; M - MISSING										HOW CLEARED (RECORD ROOM USE ONLY) Found 11-6-85 1100									
CODE NAME (LAST, FIRST, MIDDLE) R Molinari, Louise										RACE W N I C SEX F DOB OR AGE 46 RES. PHONE 668-1932 BUS. PHONE									
RESIDENCE ADDRESS 30-16TH AVENUE										BUSINESS ADDRESS									
OTHER INFORMATION / MISSING PERSON INFORMATION										VICTIM OF CRIME NOTIFICATION YES NO STAR:									
CODE NAME (LAST, FIRST, MIDDLE) M Molinari, Lisa										RACE W N I C SEX F DOB OR AGE 8/26/71 RES. PHONE 668 1932 BUS. PHONE									
RESIDENCE ADDRESS 30-16TH AVENUE										BUSINESS ADDRESS									
OTHER INFORMATION / MISSING PERSON INFORMATION										VICTIM OF CRIME NOTIFICATION YES NO STAR:									
SUSPECT CODES: A - ADMONISHED; B - BOOKED; C - CITED; D - DETAINED; E - EXONERATED; S - SUSPECT; X - DIVERTED										WEARING BACK GAT + PANTS / BROWN WHITE BLONDE									
CODE NAME (LAST, FIRST, MIDDLE)										RACE W N I C SEX DOB OR AGE ALIAS									
HEIGHT WEIGHT HAIR COLOR BLK BLN BRO GRY SANDY EYE COLOR BLK BLU BRO GRY GRN RED BALD WHI UNK HAZ MIXED UNK ADDRESS																			
WARRANT # / CITATION #										BOOK/CITE SECTION									
WHERE BOOKED										BOOK/CITE APPROVED BY STAR I.D. # (SOC. SEC.; OP. LIC.; ARMY SER. #; ETC.)									
WHEN & WHERE CITED TO APPEAR / OTHER INFORMATION / ADDITIONAL DESCRIPTION OF SUSPECT																			
VEHICLE CODES: F - USED FELONY; U - USED OTHER; S - STOLEN; R - RECOVERED; B - BOOSTED; D - STRIPPED; T - TOWED; P - STOLEN PLATES; L - L																			
CODE LICENSE PLATE NO. STATE YEAR TYPE VIN										YEAR MAKE MODEL STYLE COLOR									
CONDITION WHEN RECOVERED: 1 APPARENTLY DRIVEABLE 2 ENGINE & TRANSMISSION MISSING 3 ENGINE MISSING 4 TRANSMISSION MISSING 5 BURNED 6 WRECKED 7 OTHER STRIPPED										PLATES MISSING 1 2 NONE TOW CHECK (NAME) WAIT SIGN YES									
OTHER INFORMATION																			
PROPERTY CONDITION CODES: S - STOLEN; R - RECOVERED; L - LOST; E - EVIDENCE; F - FOUND; P - PROPERTY FOR SAFEKEEPING; D - DAMAGE																			
CODE PROPERTY DESCRIPTION										VALUE									
CODE PROPERTY DESCRIPTION 74000										VALUE									
CODE PROPERTY DESCRIPTION 75000										VALUE									
CODE PROPERTY DESCRIPTION										VALUE									
BELOW INCLUDE ADDITIONAL HEADING, VICTIMS, SUSPECTS, VEHICLES AND/OR PROPERTY BEFORE BEGINNING NARRATIVE.																			
Upon arrival at 30-16th Ave. Mrs. Molinari advised me what her daughter had left a note saying she was leaving home. Photos were obtained along with a list of friends. Subsequent interviews revealed																			
PAGE 1 OF 2															I.O.S. ENTRY BY: Ki				
SFDP 377 (11-8)																			



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INCIDENT REPORT FORM										SAN FRANCISCO POLICE DEPARTMENT									
INCIDENT NO. 851222057										<input checked="" type="checkbox"/> INITIAL <input type="checkbox"/> SUPPLEMENTARY		<input type="checkbox"/> BOOKED <input type="checkbox"/> CITED		DOMESTIC VIOLENCE YES NO		STATEMENT TAKEN? YES NO		ASSIGNED (RECORD ROOM USE ONLY)	
TYPE OF INCIDENT POSSIBLE CHILD ABUSE										M.O. CODE 5T2		DATE(S) & TIME(S) OF OCCURRENCE 11/04/85							
DATE & TIME REPORTED TO POLICE 11/05/85, 1330 hrs										DATE & TIME REPORTED TO BUREAU / OP CTR		NAME & STAR RPTD TO							
LOCATION OF OCCURRENCE 30 16th Avenue										LOCATION SENT TO 850 Bryant St. #415		TYPE OF PREMISE							
REPORTING OFFICER Insp. William Kidd 1051										STAR REPORT APPROVED BY PAUL A. KOTTA #845		STAR		HOW CLEARED RECORD ROOM USE ONLY 1					
VICTIM CODES: V - VICTIM; R - REPORTEE; W - WITNESS; P - PARENT; N - NOTIFY; F - FOUND; M - MISSING																			
CODE NAME (LAST, FIRST, MIDDLE) P. MOLINARI, Louise										ACE W N I C J OTHER UNK		SEX		DOB OR AGE 47		RES. PHONE 668-1932		BUS. PHONE	
RESIDENCE ADDRESS 30 16th Avenue										BUSINESS ADDRESS				VICTIM OF CRIME NOTIFICATION YES NO		STAR			
OTHER INFORMATION / MISSING PERSON INFORMATION																			
CODE NAME (LAST, FIRST, MIDDLE) P2 MOLINARI, John										RACE W N I C J OTHER UNK		SEX		DOB OR AGE 50		RES. PHONE 668-1932		BUS. PHONE	
RESIDENCE ADDRESS 30 16th Avenue										BUSINESS ADDRESS				VICTIM OF CRIME NOTIFICATION YES NO		STAR			
OTHER INFORMATION / MISSING PERSON INFORMATION																			
SUSPECT CODES: A - ADMONISHED; B - BOOKED; C - CITED; D - DETAINED; E - EXONERATED; S - SUSPECT; X - DIVERTED																			
CODE NAME (LAST, FIRST, MIDDLE)										RACE W N I C J OTHER UNK		SEX		DOB OR AGE		ALIAS			
HEIGHT WEIGHT HAIR COLOR BLK BLN BRO GRY SANDY RED BALD WHI UNK										EYE COLOR BLK BLU BRO GRY GRN HAZ MIXED UNK		ADDRESS							
WARRANT # / CITATION #										BOOK/CITE SECTION									
WHERE BOOKED										BOOK/CITE APPROVED BY		STAR		I.D. # (SOC. SEC.; OP. LIC.; ARMY SER. #; ETC.)					
WHEN & WHERE CITED TO APPEAR / OTHER INFORMATION / ADDITIONAL DESCRIPTION OF SUSPECT																			
VEHICLE CODES: F - USED FELONY; U - USED OTHER; S - STOLEN; R - RECOVERED; B - BOOSTED; D - STRIPPED; T - TOWED; P - STOLEN PLATES; L - LI																			
CODE LICENSE PLATE NO. STATE YEAR TYPE VIN										YEAR MAKE		MODEL		STYLE		COLOR			
CONDITION WHEN RECOVERED: 1 APPARENTLY DRIVEABLE 2 ENGINE & TRANSMISSION MISSING 3 ENGINE MISSING 4 TRANSMISSION MISSING 5 BURNED 6 WRECKED 7 OTHER STRIPPED										PLATES MISSING 1 2 NONE		TOW CHECK (NAME)		WAIT SIGN YES					
OTHER INFORMATION 15015 5T300 1134																			
PROPERTY CONDITION CODES: S - STOLEN; R - RECOVERED; L - LOST; E - EVIDENCE; F - FOUND; P - PROPERTY FOR SAFEKEEPING; D - DAMAGE																			
CODE PROPERTY DESCRIPTION														VALUE					
CODE PROPERTY DESCRIPTION														VALUE					
CODE PROPERTY DESCRIPTION														VALUE					
CODE PROPERTY DESCRIPTION														VALUE					
BELOW INCLUDE ADDITIONAL HEADING, VICTIMS, SUSPECTS, VEHICLES AND / OR PROPERTY BEFORE BEGINNING NARRATIVE.																			
V MOLINARI, Lisa 08/26/70 30 16th Avenue S.F. Attended by																			
the Sea School																			
W BASTIAN, Mike Juvenile Court Probation Officer 375 Woodside Ave.																			
W2 MANNINO, J. DAVIS DSS / Children's Emergency Response Unit Supervisor																			
2049 Grove St. 387-4686																			
PAGE 1 OF 2																			
SFDP 377 (11-																			

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1 Molinari was designated to be Dianne Feinstein's 'replacement'. Roger Boas, in the same  
2 election, was arrested for an under-age sex brothel operation for City Hall elites. Palladino later died  
3 after being attacked. Molinari threatened Plaintiffs on at least 5 occasions, at least once on network  
4 TV.

5 Forensic auditing of the Pelosi family, Feinstein family, Reid Household, Harris household  
6 and other Defendants show that from 2007 to today hundreds of millions of dollars, acquired  
7 through CASE X were deposited in their accounts. It was still less than they wanted, and they blame  
8 Plaintiffs, for reporting the crime to law enforcement and regulatory agencies, for their reduced  
9 unjust gain.

10 In addition to cutting off all means of funds, in reprisal, these vendetta-focused government  
11 officials caused Plaintiffs to lose his house.

12 Over 400 other whistle-blowers have the same attacks undertaken against them in a  
13 formulaic "hit-job" playbook set of attack tactics.

14 Plaintiffs, had an industry standard pay rate of \$10,000.00 per month, based on Salary.com,  
15 his patent issuances and accomplishment records in Silicon Valley contrasted with the salaries of  
16 less experienced executives at Google, Facebook, Netflix and Tesla. The U.S. Government states,  
17 via all of its agencies, that the minimum survivable cost-of-living in the Bay Area is \$3200.00 per  
18 month. By intentional actions of government officers, in reprisal, Plaintiffs income was reduced to  
19 \$300.00 per month for most of the past decades. Two SSA officials confessed to assisting in hit jobs  
20 on him including Mario U from the San Mateo SSA office and an official who worked at the San  
21 Francisco SSA office and who then went to work for a Senator who assisted in the attacks on  
22 Plaintiffs. When asked for Plaintiffs medical records SSA sent a huge number of medical records  
23 for two strange women in massive violation of federal medical privacy rights. The SSA Inspector  
24 General has shown Plaintiffs thousands of cases of politicians using SSA for political reprisal  
25 punishments. FBI IT experts and 'Black Hat' hackers can hack into every SSA server in minutes  
26 and change records, files and decisions. Rahm Emanuel, Nancy Pelosi and Dianne Feinstein can do  
27 it with a single phone call. It should be noted by the Court that EVERY background check file in  
28 AMERICA was hacked and stolen by China within a few hours and that every hacking tool of the

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1 NSA and CIA was hacked by Russia and posted on the internet. It is IMPOSSIBLE for anyone to  
 2 ever assert that “nobody can hack SSA”. That would be a remarkable lie. In fact, Plaintiffs have  
 3 agency confirmation that 95% of the Silicon Valley oligarchs entire family tax records, stock  
 4 accounts, political payments and payola and pretty much everything that would destroy them, has  
 5 been hacked and is in the hands of ICIJ (Panama Papers investigators), Propublica, FINCEN and  
 6 pretty much everybody they would not want to have it.

7 ***Plaintiffs demands that the Court order SSA to award Plaintiffs his full SSDI backpay***  
 8 ***from 2007 to today, with interest, based on the fact that SSA was used to harm Plaintiff as a***  
 9 ***reprisal tool. The Inspector General has proven this happens regularly and hundreds of other***  
 10 ***whistle-blowers are prepared to confirm this fact.***

11 Plaintiffs have received multiple threats of death, personal, resource or physical harm.

12  
 13  
 14 **HARM: THREATS OF DEATH AND ACTUAL MURDERS OF PEERS**

15 Plaintiffs have actually been attacked as enumerated below and has active cases with SFPD,  
 16 FBI, OSC and other agencies. Twice Plaintiffs car was rammed. The first time the attacker  
 17 performed a PIT maneuver, flipping Plaintiffs car onto the concrete median wall on the Freeway  
 18 across from Marin Joe’s restaurant in Marin County, causing massive damage. The attacker sped  
 19 away. A car next rammed Plaintiffs parked car on Wildomar in Mill Valley and, at the same  
 20 location, a man tried to drive his car through the fence into Plaintiffs cottage. Two other times,  
 21 strangers pulled up along Plaintiffs, pointed at him and yelled “you are dead”. Plaintiffs have  
 22 received threats by email and voicemail and had dead animals tossed over his fence. Further  
 23 proving the at-risk claims of Plaintiffs. Plaintiffs, and his peers, had contact with the following  
 24 persons in CASE X: ***Rajeev Motwani; Gary D. Conley; Seth Rich; Philip Haney; David Bird;***  
 25 ***Doug Bourn; Misti Epstein; Joshua Brown; Kenneth Bellando; Moritz Erhardt; Imran Aliev;***  
 26 ***Kate Matrosova; David Drye; Vincent Foster; Kathy Ferguson; Duane Garrett; Eric S. Fox; Judi***  
 27 ***Gibbs; Berta Caceres; Suzanne Coleman; L.J. Davis; John Hillyer; Stanley Huggins; Sandy***  
 28 ***Hume; Shawn Lucas; Gary Johnson; John Jones; John F. Kennedy, Jr.; Stephen Ivens; Mary***

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1 *'Caity' Mahoney; Eric Butera; Danny Casolaro; John Ashe; Tony Moser; Larry Nichols; Joseph*  
 2 *Rago; Ron Brown; Bob Simon; Don Adams; Peter Smith; Victor Thorn; Lori Klausutis; Gareth*  
 3 *Williams; Daphne Caruana Galizia; James D Johnston; Dave Goldberg; Loretta Fuddy; Paul*  
 4 *Wilcher; Gary Webb; Beranton J. Whisenant Jr; Stanley Meyer; Jon Parnell Walker; Tyler*  
 5 *Drumheller; Barnaby Jack; Dominic Di-Natale; Barbara Wise; Ilya Zhitomirskiy; Jeff Joe*  
 6 *Black; Robin Copeland; John Wheeler; Ashley Turton; Michael Hastings; Antonin Scalia;*  
 7 *David Koschman; David Werner; Alex Okrent; Kam Kuwata; Larry Frankel; And hundreds*  
 8 **more connected to this case who suddenly, and strangely, turned up dead in this case and,**  
 9 **ironically, their deaths all benefit the suspects in this case....Rajeev Motwani** taught Google  
 10 how to Google. Suddenly, in perfect health, he was found floating face-down, dead, in his Silicon  
 11 Valley swimming pool. It helps certain people that he can no longer talk. **Gary D. Conley** was the  
 12 CleanTech competitor to, and whistle-blower on, the suspects. He was suddenly found with a bullet  
 13 in his head behind Beale Air Force base. It helps certain people that he can no longer talk. He  
 14 TOLD Plaintiffs that someone from Google was going to kill him. Google programmer **Forrest**  
 15 **Hayes**, who worked on Google search engine rigging, was suddenly found dead with the story that  
 16 "he was overdosed by a Google hooker on his sex yacht". Google associate and Tesla Investments  
 17 founder **Ravi Kumar** was also killed by his hooker. Deep Google investor VC liason and husband  
 18 of Facebook executive **Cheryl Sandberg** was suddenly found dead with a hole in his head. The  
 19 "official" story is that he was the first person in history to be killed by his treadmill. **David Bird**  
 20 was the Wall Street Journal energy reporter who was working on a story that involved Cleantech  
 21 energy connections of some of the suspects. He was working on a story about who controlled the  
 22 modern energy industry and cleantech. He went for a walk and was found a long time later, dead,  
 23 floating in a pond. It helps certain people that he can no longer talk. One **Mr. Breitbart** was a  
 24 famous blogger, who railed on the web about the political manipulations of the suspects. Suddenly,  
 25 he had a "heart attack" in his shower and died. It helps certain people that he can no longer talk on  
 26 the blogs. Mr. **Karl Slym**, with Tata Motors was involved in a car deal with some of the suspects  
 27 for one of the biggest Indian auto-makers. Suddenly he was a stain on the sidewalk, accomplished  
 28 by his fall from the top of a skyscraper hotel. It helps certain people that he can no longer talk.



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1 **Doug Bourn**, The senior electrical engineer at Tesla (Google's covert partner), **Andrew Ingram** of  
2 Palo Alto, a top systems electrical engineer at Tesla; and **Brian M. Finn** the senior manager of  
3 interactive electronics, at Tesla, had deep knowledge of financial misdeeds and technical cover-ups  
4 at Tesla Motors. They were key parts of the Tesla operation. For some reason, they all got into a  
5 private airplane, in perfect health, and then the airplane plowed into the ground, killing all three at  
6 once. It helps certain people that they can no longer talk. They wrote, and helped describe, in Tesla's  
7 own federal patent filings, the fact that Tesla's batteries would kill you, maim you and/or burn your  
8 house down. Tesla did not realize this when they paid the federal patent filing fees. When Tesla,  
9 later realized this, they were forced to give all of their patents away for free. These three senior  
10 engineers had deep inside knowledge of the Tesla Motors operations. Their aircraft suffered an  
11 "Engineering failure". This case involves potential crimes by two Presidents of The United States,  
12 their staffs, U.S. Senators and the Silicon Valley oligarchs that financed and controlled them, two  
13 wars and trillions of dollars of manipulated U.S. Treasury monies and stock market monies. How  
14 could anyone think this was NOT a life-endangering situation for the Plaintiffs?

15 The other attacks, which only state-sponsored attackers would seem to be capable of, were:

16  
17 ***HARM: THE GOVERNMENT DEFRAUDED Plaintiffs OVER AND OVER:***

18 Government agency bosses solicited Plaintiffs with false promises of future loans, carbon  
19 credit sales, billions of dollars of stock market valuation profits, contracts and/or grants from  
20 their agencies and caused the Plaintiffs and his associates to expend millions of dollars and  
21 years of their time for projects which those government bosses had covertly promised to  
22 their friends. They used Plaintiffs 'nice guy' brand as a "smokescreen" to cover their illegal  
23 government slush-funds for Plaintiffs competitors and personal enemies who were OWNED  
24 by government officials. By using this tactic, the attackers drained the Plaintiffs funds and  
25 forced Plaintiffs into an economic disaster, without the government bosses fearing any  
26 reprisal for their scam. The crony insiders made hundreds of billions of dollars in profit in  
27 the notorious Solyndra-type scandals as seen in the CBS 60 Minutes episode: "***The***  
28 ***Cleantech Crash***", thousands of TV news segments and the related GAO and Congressional

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1 corruption reports.

2  
3 **HARM: THE PLACING OF MOLES AND SPYING ON Plaintiffs:**

4 White House financier Kleiner Perkins placed moles inside of Plaintiffs companies in order  
5 to sabotage, delay and misdirect operations. The moles were discovered to be staff of  
6 Kleiner Perkins. The main offices of Kleiner Perkins were broken into, per San Mateo  
7 County police reports, and records of corruption copied or duplicated by a state-sponsored  
8 intelligence agency entity, which provided further proof that Kleiner Perkins and the White  
9 House were exchanging Quid Pro Quo. Tom Perkins, one of the founders of Kleiner Perkins  
10 told Plaintiffs that he was on “A government hit-list” for exposure the corruption of Silicon  
11 Valley titans and government executives. John Doerr, another partner, told Scott at a, VC  
12 conference, that he will make sure the government kills of any effort to support fuel cells  
13 (which compete with his and Elon Musk’s lithium batteries)

14  
15 **HARM: BLOCKADES OF Plaintiffs ACCESS TO LEGAL COUNSEL:**

16 - *Detailed further in the EXHIBITS, below*, Defendants used every trick in the book to  
17 keep Plaintiffs from gaining equitable legal justice or representation because exposure of  
18 Defendants crimes would shame them Government officials and the federal agency: Legal  
19 Services Corporation (LSC corporation -A federal agency dedicated to providing legal  
20 services to citizens) blockaded Plaintiffs rights to legal representation in order to prevent  
21 Plaintiffs from personally suing the attackers because such a lawsuit would have  
22 embarrassed corrupt public officials. High tech law firms that were discussing a services  
23 agreement with Plaintiffs were threatened and ordered to not help Plaintiffs or “*they would*  
24 *be black-listed or be cut-off from tens of millions of dollars of Google, Netflix, Facebook*  
25 *and government contracts*”. Individual lawyers were threatened with black-listing and  
26 getting “*flooded with more filings than you could ever respond to in your life-time...*” LSC  
27 officials, who were almost entirely Obama Administration associates, refused to assist with  
28 lawyer referrals. That is a violation of their federal contract with The U.S. Government .



***HARM: HIRED CHARACTER ASSASSINATION AND DEFAMATION SERVICES THAT DEFENDANTS USED TO DESTROY Plaintiffs LIFE***

Defendants purchased over \$30 Million dollars of attacks against Plaintiffs with Media Matters, The Gawker/Gizmodo Tabloid empire and Google. This attack is detailed in the attached EXHIBITS. It was equal in scope and cost to an attack on a Presidential candidate by another Presidential candidates opposition research task force. A sophisticated animated attack film was produced by Google/Youtube and Nicholas Denton attacking Plaintiffs. An animated film is an expensive effort involving considerable time and expense. An attacker must be well financed to undertake such an effort. The film was published on YouTube and locked onto the very top search result line on every YouTube search in front of 7.5 billion internet users for over a decade. The damage to Plaintiffs reputation is estimated in the tens of millions of dollars. YouTube steadfastly refused to remove or adjust the search results even though YouTube executives knew Plaintiffs and knew that the video represented a character assassination attempt against Plaintiffs because YouTube owners finance the political campaigns of the public officials who ordered the attacks. While Google/Youtube stated to Congress that all of it's search results are arbitrary, the never-moving search result of this attack video proved that Google's and YouTube's search results are manually manipulated by human maintained black-lists. The corrupt officials hired Nicholas Guido Denton and his character-assassination-for-hire sleazy tabloid publication empire known as Gawker Media AKA Gizmodo Media. They own Gawker, Gizmodo, Jalopnik and a number of fake news sites based in the USA and near-Russian regions. The offshore sites are used for money laundering and tax evasion. The FBI has been asked to interview and financially trace the payments and command-and-control orders back and forth between Nicholas Guido Denton and his attacker/operatives: Ian Fette, Adrian Covert, Nick Cook, Gabrielle Darbyshire, John Hermann, Patrick George, et al and Google. All of whom transferred payments and communications between each other to conspire, operate, produce and publish the articles, videos, blogs and server manipulations for the attacks against the victims around the world. These attacks resulted in billions of dollars of damages to the victims. The orders

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1 for these attacks can be traced back to The White House. This ended Plaintiffs life but  
2 created an enemy for the DOES and ROES that has lots of of investigator contacts and  
3 nothing to lose. The Defendants have caused the deaths of more children than any other  
4 entities. Harassment is harassment - whether it happens at school, at the playground, on the  
5 job, or on the internet. But online bullying is downplayed. Victims are stigmatized, mocked  
6 as oversensitive snowflakes who can't take a joke. Plenty of people are unwilling to accept  
7 that victims can be seriously hurt by this behavior. Internet harassment is not only real and  
8 damaging, it represents a threat to the most vulnerable among us: children. Cyberbullying  
9 statistics show the high cost of online harassment. From increased depression and suicide  
10 rates to social anxiety and alienation, the pain and consequences of online harassment are as  
11 severe as they are undeniable.

12 Cyberbullying Statistics - Key Findings:

13 90% of teens in the US believe cyber harassment is a problem.

14 15% of young cyberbullying victims would prefer to keep the issue a secret.

15 Students are almost twice as likely to attempt suicide if they have been cyberbullied.

16 80% of teens say that others cyberbully because they think it is funny.

17 37% of bullying victims develop social anxiety.

18 59% of US teenagers have experienced bullying or harassment online.

19 14.5% of children between the ages of 9 and 12 have been cyberbullied.

20 66.3% of tweens tried to help the victim of cyberbullying.

21 The largest number of suicides from cyberbullying occurred in the last 12 months.

22 Imagine every new friend, potential date, your fiance', your bank, anybody.. typing your  
23 name on the internet and seeing that Google says that you are a scumbag. Nobody will ever talk to  
24 you, hire you or help you ever again. Google, Gawker and Gizmodo are now known to partner  
25 together on character assassination efforts. One of their bloggers hired to "kill" Plaintiffs even  
26 advertises himself on Facebook, globally, as an assassin-for-hire. Plaintiffs have acquired the  
27 banking records of these Co-conspirators showing that they, and the U.S. government wired  
28 millions and millions of dollars between each other for these "spy agency" dirty tricks hit jobs.

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1 Google knows Plaintiffs personally. Plaintiffs went to school and events with the founders.  
2 It was a lie for Google and YouTube to say over-and-over that they never heard of Plaintiffs so they  
3 “can’t remove the attacks because it is ‘just how their algorithm works’...” The founder’s teacher:  
4 Rajeev Motwani, revealed to Plaintiffs that Google manually sets all of their key search results BY  
5 HAND. Rajeev died ~~was murdered~~ for telling the truth about Google’s insidious plans and internet  
6 manipulations. Investigators suspect shell fish toxin or a reverse taser-like electronic heart-attack  
7 inducing defib device was used to kill him.

8 Plaintiffs charges proved that Google manually rigs search results based on cronyism and  
9 that Google/YouTube lied to Congress about not doing so. This allowed Plaintiffs to drive U.S.  
10 agencies and State AG’s to sue Google/Alphabet/Youtube for being lying, manipulate, society-  
11 abusing, child-killing, monopolistic monsters.

12 Take note of this letter from one of Plaintiffs past lawyers to those attackers:  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



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Features Editor  
GIZMODO

Re: **GIZMODO's 1/13/11 Post Entitled, "The Greatest Scam in Tech," by John Herrman and Adrian Covert**

Dear Mr. Brown:

Scott Redmond has asked me to address the harm caused by GIZMODO's self-described "exposé of Peep Wireless," entitled "The Greatest Scam in Tech," by John Herrman and Adrian Covert. This "exposé" was originally posted on January 13, 2011. At the time this letter was written the original post had over 207,000 views, with over 400 comments; Mr. Redmond's January 14 email to you, posted on GIZMODO January 18, 2011, has had over 97,000 views, with almost 900 comments. The Herrman-Covert post claims that Scott Redmond

... shows up whenever there is a bubble or hot trend in the tech business world that has yet to make it to the marketplace. Then he strings together a bunch of technical jargon that hardly informs what he's doing, and presumably gets some kind of funding. After that, he forms not one but two companies around said bubble. (Peep Telephony has Peep Wireless; Limnia, a fuel cell company, Fuel Sell; Clever Homes, FabModern). All the companies are listed at the same address in San Francisco. Ultimately, the companies just disappear, legacies reduced to comically vague blurbs in Redmond's resume – if that. \* \* \* Point is, these ventures rarely – if ever – work. And through the harsh lens of hindsight, some look like they weren't ever meant to.

While GIZMODO does not clearly engage in traditional investigative journalism, more than a few viewers apparently consider this "exposé" to be an authoritative, fact-based report. Many comments praise this as the kind of investigative article GIZMODO should publish more often (e.g., "I vote for more journalism and less press releases"). When GIZMODO publishes such an article, which clearly impugns the integrity of an individual like Mr. Redmond and subjects him to ridicule, a strong argument can be made that GIZMODO should apply the same journalistic standards that investigative reporters follow: At a minimum, neither GIZMODO nor its editors or authors should recklessly ignore the truth, as has been the case here.

GIZMODO reported a "pattern" that Mr. Redmond allegedly follows to scam investors that is demonstrably false, as a few simple Internet searches would have revealed. First, Mr. Redmond does not "show up whenever there is a bubble or hot trend in the tech business world that has yet to make it to the marketplace." Mr. Redmond's companies have largely been based on his inventions. The United States Patent & Trademark Office has to date issued 11 patents to Mr. Redmond, and additional patents have been applied for. As I'm sure you know, a patent, by definition, describes an invention that is new, not obvious, and is either useful or has industrial application. The inventions disclosed in his patents have formed the technological basis for several companies that Mr. Redmond has founded. In each case Mr. Redmond's companies have attempted to commercialize his inventions. Some ventures have been

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more successful commercially than others, but in every case they have been “*real*.” For example:

- **Limnia, Inc.**, formerly named Fuelsell Technologies, Inc., is a Delaware corporation in good standing that was incorporated on March 5, 2002 (Del. File No. 3498785) ([www.limniaenergy.com](http://www.limniaenergy.com)). Limnia’s business address is 601 Van Ness Avenue, Suite E3613, San Francisco, CA 94102. This is the location where Mr. Redmond operates his start-up incubator, Clever Industries LLC, which has been around since 1978. Limnia used venture capital funds, Mr. Redmond’s personal funds, and a U.S. Department of Energy grant (approx. \$900,000) to develop a working prototype of a hydrogen fuel cassette storage and retrieval system. The venture capital investor made a substantial return on its investment when it cashed out in 2006. Limnia’s hydrogen cassette prototype has been tested and verified by Sandia Labs, and is the subject of a funding proposal currently in negotiation with the U.S. Department of Energy. A non-disclosure agreement between Limnia and Scandia Labs prevents public disclosure of the Sandia document that validates Limnia’s hydrogen fuel cassette and demonstrates superior performance to traditional energy storage and retrieval devices. Sandia determined that a Limnia hydrogen fuel cartridge the same size and weight of a Lithium ion battery or traditional metal hydride system stores substantially more energy than either the Li-ion battery or the MH system. Limnia’s technology is based on four of Mr. Redmond’s U.S. Patents: No. 7,399,325 (Method and apparatus for a hydrogen fuel cassette distribution and recovery system—Filed 3/15/02, Issued 7/15/08); No. 7,279,222 (Solid-state hydrogen storage systems; co-inventor Andrew K. Hearley—Filed 3/21/04, Issued 10/9/07); No. 7,169,489 (Hydrogen storage, distribution, and recovery system—Filed 12/4/02, Issued 1/30/07); and No. 7,011,768 (Methods for hydrogen storage using doped alanate compositions; co-inventor Craig M. Jensen—Filed 6/16/03, Issued 3/14/06).
- **Peep Wireless Telephony Company** is a Delaware corporation in good standing that was incorporated on November 5, 2010 (Del. File No. 4894388). Peep Wireless is located at 555 California Street, 12<sup>th</sup> Floor, San Francisco, CA 94104 ([www.peepwireless.com](http://www.peepwireless.com)). Peep Wireless, initially funded by Mr. Redmond personally, is an early stage company developing software intended to replace the current system of server racks and cell towers employed by wireless network carriers. In addition to the patent portfolio acquired from WiMoto, Peep’s technology is based on the technology described in Mr. Redmond’s application to the USPTO, entitled “Mesh Based Network Architecture.” Earlier versions of the technology have been deployed by multiple companies, including the Swedish company TerraNet. According to a September 11, 2007, BBC News Report, in 2007 TerraNet launched demonstration projects in Tanzania and Ecuador and obtained £3 million in financing from the mobile phone manufacturer Ericsson to develop its wireless mesh technology. (See <http://news.bbc.co.uk/2/hi/technology/6987784.stm>.) TerraNet has reportedly since been acquired by Nokia. A search of the term “wireless mesh” yields many hits, including a Wikipedia page that includes references to U.S. military use of the technology (see [http://en.wikipedia.org/wiki/Wireless\\_mesh\\_network#cite\\_note-4](http://en.wikipedia.org/wiki/Wireless_mesh_network#cite_note-4); see also <http://www.meshdynamics.com/military-mesh-networks.html>). Peep Wireless believes it has solved the problems that have prevented other wireless mesh companies from achieving commercial success. It is too early to determine whether there is a viable business model that can succeed, but there is no question the technology is *real*.
- **RPI Advanced Technology Group** (RPI) developed, manufactured, and sold a variety of virtual reality devices, including what at the time was the smallest wearable computer display and the first 360°

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personal computer-based human gyroscopic flight simulator. These devices were based on several of Mr. Redmond's U.S. Patents: No. 5,759,044 (Method and apparatus for generating and processing absolute real time remote environments – Filed 7/6/95, Issued 6/2/98); No. 5,513,130 (Method and apparatus for generating and processing absolute real time remote environments – Filed 10/18/93, Issued 4/30/96); and No. 5,255,211 (Method and apparatus for generating and processing absolute real time remote environments—Filed 2/22/90, Issued 10/19/93). In 1996, Mr. Redmond sold RPI to a European holding company.

- **Clever Homes LLC** is an active California limited liability company that was registered December 1, 2003 (California Entity No. 200333810077). Clever Homes™ business address is 665 3rd St # 400, San Francisco, CA 94107-1968 ([www.cleverhomes.net](http://www.cleverhomes.net)). Clever Homes™ is a designer and builder of environmentally responsible, energy efficient, prefabricated homes. Mr. Redmond founded the company and was the initial investor. The company website shows more than 20 homes have been designed, with the majority currently in residential use. In 2005, Mr. Redmond sold his interest in Clever Homes™ to the current owners. The designs and methods currently in use by Clever Homes™ are based on Mr. Redmond's inventions. A well-known green demonstration home, dubbed The NowHouse, was unveiled by Clever Homes™ at the San Francisco Giant's SBC Park in October 2004. The NowHouse was subsequently donated to the City and County of San Francisco, and is currently in use as the Bayview Hunters Point Alice Griffith Community Center. **FabModern** was not a company, but rather an online design portfolio of Mr. Redmond's green home designs and personal building site.

Mr. Redmond's projects are well-documented in scores of magazine, online, newspaper and television reports. I could go on and describe additional tech projects that Mr. Redmond has successfully developed on a contract basis for many well-known consumer product manufacturers, but the majority of these contracts were performed on a confidential basis for market-testing purposes. In any event, the four examples described above make the point: Scott Redmond has a successful track record inventing and commercializing a wide range of companies, events, services, and products. As anyone even remotely familiar with the tech industry knows, investors and product developers place a premium on discretion and privacy. This prevents Mr. Redmond from responding as fully as he could: It would simply be inappropriate to expose to the GIZMOD treatment the companies and individuals with whom Mr. Redmond has contracted in the past.

GIZMOD, John Herrman, and Adrian Covert simply got it wrong, because they failed to check the facts. Had you made even a token effort to determine whether Mr. Redmond has fleeced investors with vague, pie-in-the-sky promises followed by a disappearing act, you would have found that was decidedly **not** the case. Of course, a post about a clever, generally successful, ethical inventor does not have as much prospect of going viral as a snarky exposé of an alleged scam artist.

A brief review of the posted comments makes clear that GIZMOD's recklessness has exposed Mr. Redmond to ridicule and damaged his professional reputation. At a minimum, GIZMOD should correct the record, and provide a public apology to Mr. Redmond. Given the longevity of posts on the internet, however, it is extremely unlikely that GIZMOD could meaningfully remedy the harm it has done to Mr. Redmond, even if it is so inclined.

Please contact the undersigned if the content of this letter has not persuaded you that GIZMOD has done a terrible disservice to Scott Redmond. We will be happy to meet with you to provide further evidence of Mr. Redmond's track record as a successful and ethical inventor, entrepreneur, project



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manager, and event organizer, among other things. Mr. Redmond has a record of achievement that even the most cynical visitors to GIZMODO would envy.

Please also provide this letter to GIZMODO's attorneys, so that they can discuss with me appropriate means by which you, GIZMODO, John Herrman, and Adrian Covert might rectify the damage you have caused Mr. Redmond. Thank you.

Sincerely,



Jeffrey M. Judd

cc: Remy Stern (by email ([remy@gawker.com](mailto:remy@gawker.com)))  
Brian Lam (by email ([blam@gizmodo.com](mailto:blam@gizmodo.com)))  
Scott Redmond (by email ([scottsfo200@gmail.com](mailto:scottsfo200@gmail.com)))

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1 Even though the Google/Gawker/Gizmodo produced and hosted attack articles and animated  
2 videos were completely discredited as a “*character assassination hatchet job paid for by*  
3 *politicians*”; by every known expert, Defendants still post them on their servers with hidden “P8”  
4 codes covertly embedded in the search engines to trick the public, in front of 7 billion internet  
5 readers as “payback”, in order to operate their reprisal attacks. No other servers or publishers in the  
6 world host and lock this attack media on their search results EXCEPT DEFENDANTS MEDIA  
7 COMPANIES. This ALONE would seem to prove that Defendants did the harms that they are  
8 charged with doing as Defendants are the only ones running, hosting and operating the attacks on  
9 Plaintiffs on all of Earth!

10  
11  
12 Plaintiffs have, over and over, demanded that the FBI, POLICE, FINCEN and other  
13 enforcement investigators reveal what they discovered when they traced the compensation routes  
14 and command-and-control management of these attackers. ***Plaintiffs demands that this Court order***  
15 ***the FBI, FINCEN and the NSA to reveal those compensation path records on the attackers from***  
16 ***their investigations.***

17  
18 One might wonder why it has been so hard to get this information from the authorities. If the  
19 FBI reveals that the path-of-compensation goes from Adrian Covert, Nicholas Guido Denton and  
20 John Herrman right to the Oval Office in the White House, then the question is asked and answered.  
21 White House staff members Jay Carney, David Axelrod and Robert Gibbs have said “maybe”.  
22 White House staff insider Jofi Joseph has said “without a doubt”. Rahm Emanuel’s White House  
23 staff say that, while in the White House, Rahm ordered all kinds of hit-jobs on whistle-blowers.  
24

25 Gawker Media and Gizmodo Media have engaged in the origination of, production of and  
26 global broadcast of compensated character assassination videos and articles as a reprisal-service-  
27 for-hire (like Fusion GPS, Black Cube, Black Water and other related services) because we were  
28 FBI and GAO witnesses against Gawker and Gizmodo financiers. As 1.) the only publishing group

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1 on Earth to have engaged in such attacks and 2.) since the attacks were financed by complainants  
2 business competitors and 3.) since adversaries own staff have admitted to the scheme and 4.) since  
3 communications, FBI records and previous litigation records prove complainants assertions,  
4 complainants are justified in their demands.

5  
6 The attacks and broadcast of multiple defamation attack articles and videos by Gawker  
7 Media, Google, YouTube and Gizmodo Media has been operating as recently as this today, thus the  
8 statutes of limitations are not exceeded. Well known U.S. government political figures and political  
9 financiers hired Gawker Media, Gizmodo Media and “Nick” Denton to undertake these ongoing  
10 attacks and to manipulate web servers to operate those attacks globally and permanently. The  
11 attackers hired Gawker Media, Gizmodo Media, “Nick Guido Denton”, Univision/Unimoda,  
12 Google and YouTube (essentially all the same people) to engage in reprisals because of the  
13 Plaintiffs testimony against the Cartel in federal investigations and because the Plaintiffs had  
14 superior technologies that the attackers could not compete with. Transaction documents showing  
15 payments between the “bad guys” in this case, were recently uncovered in other court cases.

16 Defendant adversaries produced a series of videos and defamation articles and used internet  
17 server technology tricks to place those attack materials in front of 7.5+ billion people day after day,  
18 year after year, refreshing the attack daily. This is, essentially, a “hit-job” service that Univision  
19 provides as a side gig through it’s TV networks and it’s offensive tabloid brands of: Gizmodo,  
20 Jalopnik, Jezebel, Gawker and other Univision/Unimoda assets along with it’s partnership with  
21 Google for the operation of such attacks. “Univision uses this service as a political-payback tool for  
22 politicians as well as an anti-trust violating anti- competition tool for its clients”, claim Plaintiffs.  
23 The Plaintiffs are informed and believe and, based on that information and belief, allege that the  
24 named Defendants herein and each of the parties designated as a “DOE” and every one of them, are  
25 legally responsible jointly and severally for the Federal RICO Statute violating events and  
26 happenings referred to in the within Complaint for Intentional Interference with Contractual  
27 Relations, Intentional Interference with Prospective Economic Advantage, Cyberstalking, Fraud,  
28 Invasion of Privacy, Unfair Competition and Theft of Intellectual Property and RICO statute

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1 violations. In particular, Defendants took compensation for, and engaged in, malicious and  
2 coordinated tactics to seek to destroy, damage, harm and ruin Plaintiffs via an illicit media “hit-job”  
3 service which Defendants regularly offered in covert commerce and engaged in regularly against  
4 targets that Defendants were hired to seek to ruin as part of reprisal, vendetta, retribution programs  
5 operated for business and political competitors of the targets. Historical facts and other history-  
6 making lawsuits by third parties, has proven Defendants to be the single largest core violator of  
7 human rights, in this manner, in the world. Defendants offer the service of creating and publishing  
8 contrived “hatchet job” movies, fake news articles, faked comments and repercussion backlinks  
9 describing the Plaintiffs in horrific descriptors. Defendants media holdings manipulate national  
10 elections.

11 Let’s be clear on this: Plaintiffs does swear, warrant and certify that Google, Facebook,  
12 YouTube, The Elon Musk Group, Twitter and Linkedin plan and operate the conscious and manual  
13 manipulation of national American elections and international elections.

14 The attack material is reposted, “impression accelerated”, “click-farm fertilized” and  
15 Streisand array cloned over-and-over by Defendants massive character assassination technology via  
16 servers, algorithms and technical internet manipulation, daily, as recently as yesterday. Defendants  
17 also embed the article in job hiring databases on Axciom, Palantir, Taleo and other databases used  
18 by all hiring and recruiting services in order to prevent Plaintiffs from ever receiving income for  
19 W2 or 1099 work ever again. Defendants own staff then post thousands of fake comments, below  
20 each attack item, under fake names, designed to make it appear as if a broad consensus of the public  
21 agreed with the defamation messages by Defendants. Almost all of the fake comments were created  
22 by a handful of Defendants own staff pretending to be a variety of outside voices. Defendants  
23 provide the service of delivering “weaponized text and media to corporate clients”. Defendants  
24 replicated various versions of these attack items across all of their different brands and facade front  
25 publications and addedadditional fake comments to each on a regular basis.

26  
27 A. Defendants have formed a business and political and industry manipulation “Cartel”  
28 intended to inflict corruption upon the United States Federal Government, The State Government

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1 and the California State authorities, as defined by law under RICO Racketeering Statutes for the  
2 purpose of manipulating the value of stock market holdings and controlling political policy  
3 decisions.

4  
5 B. In exchange for financing, Defendants Clients gave Defendants Associates business  
6 monopolies and government contract monopolies and media distribution exclusives worth trillions  
7 of dollars. This was an illegal quid-pro-quo arrangement. Plaintiffs designed, produced, received  
8 patent awards on, received federal commendations for, received federal funding for and first  
9 marketed the very products which Defendants copied and made billions of dollars on and which  
10 Defendants felt might beat them in hundreds of billions of dollars of competitive market positions  
11 and stock market trades. Companies operated by Plaintiffs included automobile design and  
12 manufacturing companies, global television broadcasting companies and energy companies which  
13 are commonly known to have generated hundreds of billions of dollars in profits, revenue and stock  
14 market transactions for Defendants competing holdings at Plaintiffs expense. Defendants operated a  
15 criminal CARTEL as defined by RICO LAWS and that Cartel ran an an anti-trust market rigging  
16 and crony political payola operation. Defendants spent tens of millions of dollars attacking  
17 Plaintiffs because Defendants were not clever enough to build better products. Defendants chose to  
18 "CHEAT RATHER THAN COMPETE" and to try to kill Plaintiffs lives, careers, brands, revenues,  
19 assets, businesses and efforts via malicious and ongoing efforts.

20  
21 C. The U.S. Attorney General has been informed, in writing, of these charges and Plaintiffs  
22 understand that DOJ officials have an ongoing investigation into these matters. Under investigation  
23 for these crimes, New York State attorney general Eric Schneiderman was recently forced to quit over  
24 corruption and sexual cult charges involving the NXIUM group and related matters.

25  
26 D. Due to Defendants fears of the loss of up a trillion dollars of crony payola from their  
27 illegal abuse of taxpayer funds, Defendants engaged in felonious actions in order seek to intimidate  
28 others.

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1  
2 E. Just as, over time, the Watergate crimes are now intimately documented and detailed;  
3 over time The “Cleantech Crash Scandal” as featured on CBS News 60 MINUTES TV Show, has  
4 been detailed and exposed in numerous federal, news media and public investigations. Significant  
5 barriers to justice were illicitly placed in front of Plaintiffs by Defendants.

6 F. Defendants organized and operated a series of malicious attacks and thefts against  
7 Plaintiffs as reprisals and competitive vendettas. Defendants report to the FBI, GAO, FTC, SEC,  
8 Congressional Ethics Committees, The White House and other entities on a regular basis.  
9

10 G. Defendants and their associates Elon Musk, Jon Doerr, Eric Schmidt, Larry Page, Steve  
11 Jurvetson, Vinod Khosla and other members of the “Silicon Valley Cartel” are documented in tens  
12 of thousands of news reports, federal law enforcement reports and Congressional reports in their  
13 attempts to infiltrate and corrupt the U.S. Government in an attempt to route trillions of tax dollars  
14 to Defendants private accounts. Defendants perceived Plaintiffs as a threat to their crimes. Federal  
15 investigators, news investigators and whistle-blowers have reported to Plaintiffs that Defendants  
16 were the financiers and/or beneficiaries and/or command and control operatives for the crimes and  
17 corruption disclosed in the CBS NEWS 60 Minutes investigative reports entitled: “The Cleantech  
18 Crash”, “The Lobbyists Playbook” and “Congress Trading on Insider Information”; The Feature  
19 Film: “The Car and the Senator” Federal lawsuits with case numbers of: USCA Case #16-5279; and  
20 over 50 other cases including the ongoing “Solyndra” investigation and federal and Congressional  
21 investigations detailed at:

22 <http://greencorruption.blogspot.com>

23 and

24 [https://theintercept.com/2016/04/22/googles-remarkably-close-relationship-with-the-obama-white-](https://theintercept.com/2016/04/22/googles-remarkably-close-relationship-with-the-obama-white-house-in-two-charts/)  
25 [house-in-two-charts/](https://theintercept.com/2016/04/22/googles-remarkably-close-relationship-with-the-obama-white-house-in-two-charts/)

26  
27 ... and thousands of other documentation sites. Plaintiffs are charged with engaging in these crimes  
28 and corruptions against Plaintiffs and financing and ordering attacks on Plaintiffs. Plaintiffs



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engaged in U.S. commerce and did everything properly and legally. Unlike Defendants, Plaintiffs did not steal technology. Unlike Defendants, Plaintiffs did not bribe elected officials in order to get market exclusives. Unlike Defendants, Plaintiffs did not poach Defendants staff. Unlike Defendants, Plaintiffs were the original inventors of their products. Unlike Defendants, Plaintiffs did not operate “AngelGate Collusion” schemes and “High Tech No Poaching Secret Agreements” and a Mafia-like Silicon Valley exclusionary Cartel. Unlike Defendants, Plaintiffs did not place their employees in the U.S. Government, The California Government, The U.S. Patent Office and The U.S. Department of Energy in order to control government contracts to Defendants exclusive advantage. Unlike Defendants, Plaintiffs did not place moles inside of competitors companies. Unlike Defendants, Plaintiffs did not hire Gawker Media and Think Progress to seek to kill Plaintiffs careers, lives and brands. Unlike Defendants, Plaintiffs did not rig the stock market with “pump-and-dump”, “Flash Boy” and “Google-stock/PR-pump” schemes. Plaintiffs engaged in hard work every day of their lives for the time-frame in question under the belief that the good old American work ethic and just rewards for your creations was still in effect in the U.S.A., and that the thieves and criminals that attempted to interdict Plaintiffs would face Justice. In a number of circumstances Defendants took advantages of Plaintiffs hard work via come-ons; Defendants then made billions of dollars from Plaintiffs work at Plaintiffs expense and attacked Plaintiffs in order to reduce Plaintiffs competitive and legal recovery options.

H. Defendants exchanged payments for services via cash, stock warrants, illicit personal services, media control and a technology known as a “Streisand Effect Massive Server Array” which can control public impressions for, or against a person, party, ideology or issue. Defendants StreisandEffect internet system was used to destroy Plaintiffs in reprisal, retribution, and vendetta for Plaintiffs help with law enforcement efforts in the case and because Plaintiffs companies competed with Defendants companies with superior technologies.

I. Defendants have used their Streisand Effect technology to build a character assassination ring of bloggers and hired shill “reporters” who engage in a process called a “Shiva”. This process

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1 is named after a Plaintiffs in a similar case named: Shiva Ayyadurai, the husband of Actress Fran  
2 Drescher. Shiva Ayyadurai holds intellectual property rights to part of Defendants email  
3 technology. In fact, the people most threatened by the Shiva Ayyadurai patent right claims,  
4 ironically turn out to be Defendants and, in particular, Defendants associates Elon Musk, Jon Doerr,  
5 Eric Schmidt, Larry Page, Steve Jurvetson, Vinod Khosla and other members of the “Silicon Mafia”  
6 who own most of the main companies exploiting email technology. Were Shiva Ayyadurai to  
7 prevail in his claims, Defendants would owe him billions of dollars. “Running A Shiva” involves  
8 the production of a series of Defamation articles by bloggers who act as if they are independent from  
9 Defendants but are in fact, not. Defendants used “the Shiva” to attack and seek to destroy Donald  
10 Trump, Shiva Ayyadurai, Plaintiffs, and numerous political figures. Univision, Unimoda, Jalo pnik,  
11 Gawker Media, Gizmodo and over a hundred stealth-ed, and overt, assets of Defendants have been  
12 using “The Shiva” network to attack Donald Trump, Shiva Ayyadurai, Plaintiffs, and numerous  
13 political figures as recently as this morning, thus, the time bar restarts every day. Plaintiffs have  
14 pleaded with Defendants to cease their attacks but Defendants have refused to comply. Even with  
15 Fran Drescher’s ongoing royalty payments from her popular television series, friends have reported  
16 that the attacks on the Ayyadurai family have been devastating and have caused massive damages  
17 and personal and emotional devastation.

18  
19 J. Defendants produced animated movies, attack articles, fake blog comments, DNS routes,  
20 “Shiva” Campaigns, and other attack media against Plaintiffs and expended over \$30 million dollars  
21 in value, as quantified by Defendants partner: Google, in placing the attack material in front of 7.5  
22 billion people on the planet for the rest of Plaintiffs lifetime. No person could survive such an attack  
23 and in the case of Plaintiffs, lives were destroyed and multiple companies invested into by  
24 Plaintiffs, which Defendants made over \$50B off of the copies of, were destroyed because they  
25 competed with Defendants.

26  
27 8. The Plaintiffs are informed and believe, and based on that information and belief allege  
28 that at all times mentioned in the within Complaint, all Defendants were the agents, owners and

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employees of their affiliated insiders and, in doing the things alleged in this Complaint, were acting within the course and scope of such agency and employment.

9. As to any corporate employer specifically named, or named as a “DOE” herein, the Plaintiffs are informed and believe and therefore allege that any act, conduct, course of conduct or omission, alleged herein to have been undertaken with sufficient, malice, fraud and oppression to justify an award of punitive damages, was, in fact, completed with the advance knowledge and conscious disregard, authorization, or ratification of and by an officer, director, or managing agent of such corporation. The Statute of Limitations and time bar on this case has not expired. Plaintiffs only became aware of **all** of the facts recently due to the FBI, Congressional and hacker-exposed investigation data on Defendants operating and receiving cash, rewards and assets from an illegal and illicit set of political slush-funds established to compensate them for financing political campaigns. The Sony, Clinton, DNC, HSBC, Panama Papers and other hacks and publication of all of the relevant files and the Congressional investigation of illicit activities and the continuing issuance of federal documents to Plaintiffs confirming Plaintiffs intellectual property are all vastly WITHIN the statutes of limitations to allow this case to proceed to Jury Trial. Plaintiffs have had a long, ongoing and high-level interaction with Defendant in both the work effort and the monetization and collection effort. Plaintiffs have been continually interactive with Defendant in order to try to collect his money. Attacks and interference with Plaintiffs have occurred as recently as this week by Defendants. The Plaintiffs, whose multiple businesses ventures had already suffered significant damage as the result of the online attacks of the Defendants, contacted renowned experts, and especially Search Engine Optimization and forensic internet technology (IT) experts, to clear and clean the internet of the false, defamatory, misleading and manufactured information belittling the Plaintiffs, attacking them and discrediting their reputation as an inventor, product developer and project director from their websites.

None of the technology experts hired by the Plaintiffs, at substantial expense, were successful in their attempts to clear, manage or even modify the false, defamatory, misleading and manufactured information belittling the Plaintiffs, attacking him and discrediting their reputation as

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1 an inventor, product developer and project director which only Defendants, the controlling entity of  
2 the internet, refused to remove. In fact, those experts were able to even more deeply confirm, via  
3 technical forensic internet analysis and criminology technology examination techniques that  
4 Defendants was rigging internet search results for its own purposes and anti-trust goals.

5 All efforts, including efforts to suppress or de-rank the results of a name search for  
6 “Plaintiffs” failed, and even though tests on other brands and names, for other unrelated parties did  
7 achieve balance, the SEO and IT tests clearly proved that Defendants was consciously, manually,  
8 maliciously and intentionally rigging its search engine and adjacent results in order to “mood  
9 manipulate” an attack on Plaintiffs.

10 In fact, the experts and all of them, instead, informed the Plaintiffs, that, not only had  
11 Defendants locked the false, defamatory, misleading and manufactured information belittling the  
12 Plaintiffs, attacking them and discrediting their reputation as an inventor, project developer and  
13 project director into its search engine so that the information could never be cleared, managed or  
14 even modified, Defendants had assigned the false, defamatory, misleading and manufactured  
15 information belittling the Plaintiffs, attacking them and discrediting their reputation as an inventor,  
16 project developer and project director “PR8” algorithmic internet search engine coding embedded in  
17 the internet information-set programmed into Defendantsinternet architecture. [See, Information  
18 received from one of over 30 IT, forensic network investigators and forensic SEO test analysts, a  
19 true and correct copy of which is attached hereto in the Exhibits.]

20  
21 Per the many world-wide search engine results forensic analysis experts Plaintiffs hired –  
22 They had never seen search engines results that were locked so maliciously, manually and  
23 unmovably into Google’s and YouTube’s search results. “It was as if the CIA, or Larry Page  
24 himself, was doing this”, said one. Plaintiffs placed associates inside of Google and, among other  
25 things, acquired bank records proving Google and the attackers were exchanging millions of dollar  
26 with each other.

27 Plaintiffs even went to the effort of placing nearly a thousand virtual forensic test servers  
28 around the globe, using empty space on third-party existing servers owned by hundreds of other

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1 people, in order to monitor and metricize the manipulations of search results of examples of the  
2 Plaintiffs name in comparison to the manipulations for PR hype for Defendants financial partners,  
3 for example: the occurrence of the phrase "Elon Musk", Defendants business partner and  
4 beneficiary, over a five year period. The EU, China, Russia, and numerous research groups (ie:  
5 [http://www.politico.com/magazine/story/2015/08/how-google-could-rig-the-2016-election-](http://www.politico.com/magazine/story/2015/08/how-google-could-rig-the-2016-election-121548)  
6 [121548](http://www.politico.com/magazine/story/2015/08/how-google-could-rig-the-2016-election-121548) By Robert Epstein ) have validated these forensic studies of Defendants architect-ed  
7 character assassination and partner hype system .

8 The "PR8" codes are hidden codes within the Defendants software and internet architecture  
9 which profess to state that a link is a "fact" or is an authoritative factual document per Defendants  
10 research. By placing "PR8" codes in the defamatory links that Defendants was manipulating about  
11 Plaintiffs, Defendants was seeking to tell the world that the links pointed to "Facts" and not  
12 "Opinions". Defendants embedded many covert codes in their architecture which marketing the  
13 material in the attack links and video as "facts" according to Defendants.

14 The "PR8" codes are a set of codes assigned and programmed into the internet, by the  
15 Defendants to matters it designates as dependable and true, thereby attributing primary status as the  
16 most Defendants is known to have provided tens of millions of dollars to this tabloid chain per  
17 Defendants financial staff, SEC filings and disclosures in other legal cases.

18 Plaintiffs also used CIA technology call "Steganography" to embed text-based messages and  
19 codes into photos and videos in order track Google and YouTube's global impression manipulations  
20 and create a significant and important link to be viewed by online researchers regarding the subject  
21 of their search.

22 Defendants were fully aware that all of the information in the attack articles against  
23 Plaintiffs was false, Defendants promo ted these attacks as vindictive vendetta-like retribution  
24 against Plaintiffs.

25 At all times Defendants maintained it had no subjective control or input into the rankings of  
26 links obtained by online researchers as the result of a search on its search engines and that its search  
27 engine algorithms and the functions of its media assets were entirely "arbitrary" according to the  
28 owners and founders of Defendants.



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1 In or about April 15, 2015, The European Union Commission took direct aim at Defendants  
2 charging the their Internet-search giant with skewing and rigging search engine results in order to  
3 damage those who competed with Defendants business and ideological interests.

4 In those proceedings, although Defendants continued to maintain that it has no subjective  
5 control or input into the rankings of links obtained by online researchers as the result of a search  
6 on its search engines and that its staff had no ability to reset, target, mood manipulate, arrange  
7 adjacent text or links, up-rank, down-rank or otherwise engage in human input which would change  
8 algorithm, search results, perceptions or subliminal perspectives of consumers, voters, or any other  
9 class of users of the worldwide web, also known as The Internet, the court, in accord with evidence  
10 submitted, determined that Defendants, does in fact have and does in fact exercise, subjective  
11 control over the results of information revealed by searches on its search engine.

12 Defendants has a variety of such hidden codes and has various internal names for such codes  
13 besides, and in addition to, "PR8". Defendants has been proven to use these fact vs. fiction  
14 rankings to affect elections, competitors rankings, ie: removing the company: NEXTAG from  
15 competing with Defendants on-line; or removing political candidates from superior internet  
16 exposure and it is believed by investigators and journalists, that Defendants are being protected  
17 from criminal prosecution by public officials who Defendants have compensated with un-reported  
18 campaign funding. As a result of receiving this information, the Plaintiffs became convinced of the  
19 strength and veracity of their original opinion that the Defendants, had, in fact posted the false,  
20 defamatory, misleading and manufactured information belittling the Plaintiffs, attacking them and  
21 discrediting Plaintiffs reputation as inventor, project developer and project designer had been  
22 intentionally designed, published, orchestrated and posted by them in retaliation to the true  
23 testimony provided by the Plaintiffs, to the Government Office of Accountability of the United  
24 States in May of 2005, and to the Securities and Exchange Commission, The Federal Bureau of  
25 Investigation, The United States Senate Ethics Committee and other investigating parties, and had  
26 been disseminated maliciously and intentionally by them in an effort to do damage to their  
27 reputation and to their business prospects and to cause him severe and irremediable emotional  
28 distress.

1  
2 In fact, the Plaintiffs, has suffered significant and irremediable damage to their reputation  
3 and to their financial and business interests. As a natural result of this damage, as intended by the  
4 Defendants, Plaintiffshas also suffered severe and irremediable emotional distress.

5  
6 To this day, despite the age of the false, defamatory, misleading and manufactured  
7 information belittling the Plaintiffs, attacking him and discrediting their reputation as an inventor,  
8 project developer and project director, in the event any online researcher searches for information  
9 regarding the Plaintiffs, the same information appears at the top of any list of resulting links.

10  
11 In addition, due to their control of all major internet database interfaces, Defendants have  
12 helped to load negative information about Plaintiffs on every major HR and employment database  
13 that Plaintiffs might be searched on, thus denying Plaintiffs all reasonable rights to income around  
14 the globe by linking every internal job, hiring, recruiter, employment, consulting, contracting or  
15 other revenue engagement opportunity for Plaintiffs back to false “red flag” or negative false  
16 background data which is designed to prevent Plaintiffs from future income in retribution for  
17 Plaintiffs assistance to federal investigators.

18  
19 ***HARM: DEFENDANTS USED FACTORY-PROCESSED SOCIAL MEDIA ATTACKS***  
20 ***AGAINST Plaintiffs:***

21 In the attached book: “**ATTACKED**”, the Court will see the CIA, FSB and MI6 tactics and  
22 techniques that are trained and practiced, illicitly, by political officials. Social networking  
23 sites including MeetUp, Match, Facebook, etc. and all other IAC-owned, or similar, sites  
24 (IAC is managed by Hillary Clinton's daughter, whose Mother knew Plaintiffs) have had  
25 their profiles, texts, and inter-member communications, since those companies were started,  
26 hacked or purchased. The financiers of almost everyone of these sites are also the financiers  
27 of the suspects. The attack service providers use Palantir, Acronym, In-Q-Tel financed data  
28 analysis software to analyze every activity in those services in order to find honey-trap,  
blackmail and social conflict exploitation opportunities. Your social life will, essentially,

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1 end. Every photo on every social site is cross checked with every other photo on the internet  
2 in order to cull your Facebook, LinkedIn, Snapchat and other social media together to create  
3 a total manipulation profile data file on you. New contacts on these sites were contacted by  
4 the attackers and told to “avoid” the Plaintiffs in order to damage Plaintiffs. These attacks  
5 were all documented and operated against Plaintiffs as detailed in the **EXHIBITS** and  
6 evidence repositories. Defendants bought these services from Eastern Bloc nations, China  
7 and South America. “The Agency”, in Russia does much of this work. They are hard at  
8 work, even as recently as today according to the CIA, pushing a “positive spin” on Russia’s  
9 invasion of the Ukraine based on Hunter Biden’s computer leaks.

10  
11 ***HARM: GOVERNMENT OFFICIALS CAUSED SSA AND HUD BENEFITS BLOCKADES  
AND MANIPULATIONS AS REPRISAL AGAINST Plaintiffs:***

12 Social Security, SSI, SDI, Disability and other earned benefits were stone-walled.  
13 Applications for benefits for the Plaintiffs were intentionally “lost” like a “Lois Lerner hard  
14 drive”. Files in the application process “disappeared”. A U.S. Senator ordered Plaintiffs  
15 benefits to “never be approved” even though Plaintiffs worked 60 hour+ weeks for decades  
16 in service to their nation and their community. A SSA official in the local SSA office, who  
17 had a devout expressed hatred against one United States President ordered a benefits  
18 blockade against Plaintiffs because he found out that Plaintiffs ex-lawyer now worked in the  
19 White House. Forensic evidence and backgrounders on every person who worked on, or had  
20 access to, Applicants files, records, benefits decisions and related data sets shows that a  
21 number of those employees and contractors were members, financiers, web promoters or  
22 supporters of ANTIFA anarchy groups or KKK or Proud Boys related political activist-type  
23 groups. In San Francisco and Marin Counties SSA offices, in employees workspaces and on  
24 their Facebook and MySpace sites, many employees proudly display pictures of themselves  
25 wearing their pink “pussy hats”, black riot gear and sporting political tattoos. FBI records  
26 and IG investigations show that SSA has the highest percentage of political activist  
27 employees of any federal agency. Such persons are inclined to become drunk with power  
28 when allowed access to the trillions of dollars of government technology on the SSA file and

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1 decisions systems. A number of these persons have worked for, or with, U.S. Senators and  
2 other politicians who targeted Applicant in political reprisal. At least 3 persons in the San  
3 Francisco SSA office, at least 2 persons in the San Mateo SSA office and at least 2 persons  
4 in Marin SSA office are known to have engaged in such actions. Applicants funding and  
5 benefits were manipulated, so as to harm Applicant, as political reprisal as vendetta for his  
6 provision of testimony to federal investigators in a trillion dollar political corruption matter  
7 involving famous political figures featured in global news coverage. A vast number of  
8 agency abuse cases and lawsuits are now on public record in the Inspector General's offices  
9 and federal courts. It is an indisputable fact that some government agencies run "hit-jobs" on  
10 citizens on orders from certain corrupt politicians.

11 These actions are felony violations of the law. Federal and State Agencies including SSA,  
12 FEC, GOVT, HHS, VA, CIA, HUD, SA, SEC, FBI, DOJ and many others, have been  
13 charged, and found guilty, in these crimes against citizens. In the Congressional  
14 investigation published by the United States Congress in review of the U.S. Department of  
15 Energy LGP/ATVM programs, it is clearly proven that the U.S. Department of Energy was  
16 used as a slush-fund by some GOVT executives in order to pay off campaign financiers by  
17 attacking and sabotaging their competitors. The GOVT Paducah Gaseous Diffusion Plant  
18 under contracts with The U.S. Government and the government-owned U.S. Enrichment  
19 Corp paid \$5M whistle-blower awards to those whistle-blowers who were attacked, using  
20 government agency resources, for reporting a crime. Dept. of Energy Hanford URS has  
21 agreed to settle a lawsuit brought by former employee Walter Tamosaitis for \$4.1 million.  
22 The settlement in the whistle-blower case comes almost one year before the case was set for  
23 a jury trial in federal court in Richland and compensates Tamosaitis for attacks against him,  
24 by GOVT officials, in retribution for reporting a crime. VA officials attacked hundreds of  
25 citizens who reported corruption, ie:

26 [https://www.thenewamerican.com/usnews/health-care/item/18610-va-whistleblowers-](https://www.thenewamerican.com/usnews/health-care/item/18610-va-whistleblowers-facing-retribution)  
27 [facing-retribution](https://www.thenewamerican.com/usnews/health-care/item/18610-va-whistleblowers-facing-retribution). As shown in this report: [https://www.pogo.org/analysis/2018/08/new-](https://www.pogo.org/analysis/2018/08/new-report-confirms-whistleblower-retaliation-is-alive-and-well-at-department-of-veterans-)  
28 [report-confirms-whistleblower-retaliation-is-alive-and-well-at-department-of-veterans-](https://www.pogo.org/analysis/2018/08/new-report-confirms-whistleblower-retaliation-is-alive-and-well-at-department-of-veterans-)

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1 affairs/, Agencies attack often and harshly. CIA and NSA executives have been widely  
2 shown to use spy tools to attack domestic citizens they don't like, ie:  
3 [https://www.dailymail.co.uk/news/article-2435011/NSA-employees-used-phone-tapping-](https://www.dailymail.co.uk/news/article-2435011/NSA-employees-used-phone-tapping-tools-spy-girlfriends-cheating-husbands.html)  
4 [tools-spy-girlfriends-cheating-husbands.html](https://www.dailymail.co.uk/news/article-2435011/NSA-employees-used-phone-tapping-tools-spy-girlfriends-cheating-husbands.html) , and hundreds of other news links that can be  
5 provided. Elon Musk and Tesla, as well as Eric Schmidt and Larry Page at Google, have  
6 been proven to use the CIA group: IN-Q-TEL, to run government sponsored/financed  
7 attacks on business competitors. In Civil Action No. 1:13-cv-00777-RBW GOVERNMENT  
8 AGENCIES WERE CAUGHT BEING USED FOR ATTACKS AGAINST CITIZENS  
9 AND PUNISHED IN THE COURT AND THE MEDIA! The IRS, and hordes of other  
10 government agencies have been caught and proven, IN COURT, to target and attack people  
11 for presumed political differences.

12 Why should we assume that the Social Security Administration is not ALSO doing this too  
13 to harm citizens who speak out? The Lois Lerner IRS attacks took many years to resolve. In  
14 an unprecedented victorious conclusion to a four year-long legal battle against the IRS, the  
15 bureaucratic agency admitted in federal court that it wrongfully targeted citizens, during the  
16 Obama Administration, because of their political viewpoints and issued an apology to those  
17 people for doing so. In addition, the IRS is consenting to a court order that would prohibit it  
18 from ever engaging in this form of unconstitutional discrimination in the future. In a  
19 proposed Consent Order filed with the Court, the IRS has apologized for its treatment of  
20 U.S. citizens including organizations from 20 states that applied for 501(c)(3) and (c)(4) tax-  
21 exempt status with the IRS between 2009 and 2012 -- during the tax-exempt determinations  
22 process. Crucially, following years of denial by the IRS and blame-shifting by IRS officials,  
23 the agency now expressly admits that its treatment of our clients was wrong and a total  
24 violation of our Democracy. As set forth in the proposed Order: "The IRS admits that its  
25 treatment of Plaintiffs during the tax-exempt determinations process, including screening  
26 their applications based on their names or policy positions, subjecting those applications to  
27 heightened scrutiny and inordinate delays, and demanding of some Plaintiffs' information  
28 that TIGTA determined was unnecessary to the agency's determination of their tax-exempt



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1 status, was wrong.

2 For such treatment, the IRS expresses its sincere apology.” Throughout litigation of this  
3 case, activists have remained committed to protecting the rights of the public who faced  
4 unlawful and discriminatory action by the IRS and other agencies. The objective from the  
5 very beginning has been to hold agencies accountable for corrupt practices.

6 This Consent Order represents a historic victory for the public and sends the unequivocal  
7 message that a government agency’s targeting of citizens organizations, or any organization,  
8 on the basis of political viewpoints, will never be tolerated and that revenge will be swift  
9 and vast. The Order will put an end, once and for all, to the abhorrent practices utilized  
10 against citizens, as the agreement includes the IRS’s express acknowledgment of – and  
11 apology for – its wrongful treatment of the public. While this agreement is designed to  
12 prevent any such practices from occurring again, rest assured that all public interest lawyers  
13 will remain vigilant to ensure that the IRS, SSA, DOJ or SEC does not resort to such tactics  
14 in the future. Per detailed reports, in March of 2012 lawyers began being contacted by  
15 literally dozens of citizens and groups who were being harassed by the Obama IRS after  
16 submitting applications for tax-exempt status. Their tax-exempt applications were held up  
17 for years (over seven years in some cases), and they began receiving obtrusive and  
18 unconstitutional requests for donor and member information. That began a now more than  
19 five and a half year fight with the burgeoning bureaucracy at the IRS. Then on May 10,  
20 2013, Lois Lerner, the then head of the IRS Tax Exempt Organizations Division, publicly  
21 implicated the IRS in one of the worst political targeting scandals of the century.

22  
23 This is an extraordinary victory against government agency abuse. It sends a powerful  
24 warning to the deep state bureaucracy that it will not be allowed to violate the Constitution  
25 in order to silence and shut down the whistle-blowers. In addition to the IRS’s admissions of  
26 and apology for its wrongful conduct, the Consent Order would specifically award Plaintiffs  
27 the following: - A declaration by the Court that it is wrong to apply the United States tax  
28 code to any tax-exempt applicant or entity based solely on such entity’s name, any lawful

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positions it espouses on any issues, or its associations or perceived associations with a particular political movement, position or viewpoint; - A declaration by the Court that any action or inaction taken by the IRS must be applied evenhandedly and not based solely on a tax-exempt applicant or entity's name, political viewpoint, or associations or perceived associations with a particular political movement, position or viewpoint; and - A declaration by the Court that discrimination on the basis of political viewpoint in administering the United States tax code violates fundamental First Amendment rights.

Disparate treatment of taxpayers based solely on the taxpayers' names, any lawful positions the taxpayers espouse on any issues, or the taxpayers' associations or perceived associations with a particular political movement, position or viewpoint is unlawful. In the Order, the IRS has also agreed that (unless expressly required by law) certain actions against the Plaintiffs— i.e. the sharing, dissemination, or other use of information unnecessarily obtained by the IRS during the determinations process (such as donor names, the names of volunteers, political affiliations of an organization's officers, etc.) – would be unlawful. In addition, the IRS promises not to take any retaliatory action against our clients for exposing the targeting scheme. Finally, and of crucial significance, the IRS admits it targeted persons and groups based on their viewpoints (i.e., “policy positions”) and that such viewpoint discrimination violates fundamental First Amendment rights. This is the first time the IRS has admitted that its targeting scheme was not just “inappropriate” – as TIGTA found – but, as alleged, blatantly unconstitutional. To ensure consistency and uniformity within the agency's operations going forward, the IRS is required, pursuant to the Order, to inform all employees within the Exempt Organizations Division, as well as the Commissioners and Deputy Commissioners within other divisions, of the Order's terms. This Order not only validates allegations about their treatment at the hands of the corrupt Obama-era IRS but also provides important assurances to the American public that the agency understands its obligation to refrain from further such discriminatory conduct. As Attorney General Sessions acknowledged in this regard, “[t]here is no excuse for [the IRS's] conduct,” as it is “without question” that the First Amendment prohibits the conduct that occurred here, i.e.,

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1       subjecting American citizens to disparate treatment “based solely on their viewpoint or  
2       ideology.” Sessions further confirmed his Department’s commitment to ensuring that the  
3       “abuse of power” in which the IRS engaged here “will not be tolerated.” It is impossible to  
4       overstate the importance of this victory.

5       This marks a years-long fight for justice in defense of the constitutional rights of the public.  
6       This is an extraordinary victory against abuse of power and corruption. It sends a powerful  
7       warning to the deep state bureaucracy that it will not be allowed to violate the Constitution  
8       and manipulate the IRS, SSA and other agencies in order to silence and shut down those  
9       who speak out about political corruption crimes. In the wake of Wisconsin Watchdog’s  
10      investigation into SSA staff allegations of incompetence, misconduct, and retaliation in  
11      Social Security disability appeals offices, several employees have taken their complaints to a  
12      Senate committee led by Wisconsin Sen. Ron Johnson.

13  
14      An official with knowledge of the complaints said the Senate Homeland Security and  
15      Governmental Affairs Committee, chaired by the Oshkosh Republican, has received emails  
16      and other contacts from “certain people” inside the Social Security Administration’s Office  
17      of Disability Adjudication and Review. The initial complaints came from an employee  
18      inside the Milwaukee office following Wisconsin Watchdog’s opening investigative report  
19      that found some claimants waiting more than 1,000 days for an appeals decision on their  
20      disability benefits claim. Following Wednesday’s story of a whistle-blower in the Madison  
21      ODAR office, the committee has received more specific complaints about retaliation against  
22      employees, the source said. Committee staff members sent the latest Watchdog piece to SSA  
23      administrators hoping they will “cooperate,” the source said. To date, the agency has been  
24      less than cooperative. “This is an ongoing process, and they are not always as forthcoming  
25      as we’d like them to be,” the source said. “Hopefully with your continued reporting, this is  
26      an issue they can’t duck.” A Senate committee member said officials there are working with  
27      the Office of Special Counsel on “multiple whistle-blower retaliation claims.” The  
28      committee continues to request information from the SSA. The whistle-blower in the

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1 Madison office claims management retaliated against her after she was called to testify in a  
2 misconduct case.

3 The incident involved “inappropriate behavior” by an administrative law judge, she said.  
4 “They are so corrupt. It’s absolutely horrible,” said the woman, a lead case technician in the  
5 Madison Office of Disability Adjudication and Review. She spoke on condition of  
6 anonymity, fearing more retribution from her supervisors. While she said recounting her  
7 particular experiences will more than likely betray her identity anyway, the ODAR case  
8 worker insisted she has had enough. “I’m at point where they don’t care about me, I don’t  
9 see why I’m protecting them. This is my last resort,” she said. “I want to do my work  
10 without fear of retaliation.” She said she has contacted the Senate committee. “I forwarded  
11 my information to them and I got an email back from them. See these reports:

- 12 • [WSJ: 131 Federal Judges Broke Law by Hearing Cases Where They Had Financial](#)  
13 [Interest...](#)

14  
15 [Dirty profits from bench...](#)

16 [https://www.wsj.com/articles/hidden-interest-judges-financial-conflicts-graphic-](https://www.wsj.com/articles/hidden-interest-judges-financial-conflicts-graphic-11632834079)  
17 [11632834079](https://www.wsj.com/articles/hidden-interest-judges-financial-conflicts-graphic-11632834079)

- 18 • [https://www.wsj.com/articles/131-federal-judges-broke-the-law-by-hearing-cases-where-](https://www.wsj.com/articles/131-federal-judges-broke-the-law-by-hearing-cases-where-they-had-a-financial-interest-11632834421)  
19 [they-had-a-financial-interest-11632834421](https://www.wsj.com/articles/131-federal-judges-broke-the-law-by-hearing-cases-where-they-had-a-financial-interest-11632834421)

- 20  
21 • They said people are coming out of the woodwork with their complaints (about ODAR)  
22 following your story,” the whistle-blower said. Ronald Klym, a long-time senior legal  
23 assistant in the Milwaukee ODAR office, alleges he has been retaliated against by  
24 supervisors for going public with his charges of incompetence and misconduct in the  
25 agency. The federal employee, who has worked for SSA for 16 years, provided Wisconsin  
26 Watchdog with documents showing extremely long wait times for claimants appealing their  
27 denied applications for benefits. Doug Nguyen, SSA regional spokesman, in a previous story  
28 said the agency acknowledges that Milwaukee ODAR has a “high average processing time

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for disability appeal hearings, and we are working to address the issue.” Beyond the delays is what Klym calls the “shell game,” the wholesale transferring of cases to other parts of the country by administrators to make the Milwaukee office’s numbers look better than they are. The Madison office whistle-blower confirmed Klym’s allegations, saying at one point she saw 2,000 cases from the Milwaukee office handed off to the Oak Brook operation. There are over 10,000 SSA disability manipulation charges against SSA executives and staff.

**HARM: DEFENDANTS USED BLACKLISTING AGAINST Plaintiffs:**

ie: [The U.S. Stops Silicon Valley's 'No Poaching' Deals. . . a ...](#)

<https://www.aol.com › 2010 › 09 › 26 › doj-stops-silicon-valleys-no-poaching-deals-a-few-years-t>

DOJ Stops **Silicon Valley's 'No Poaching'** Deals. ... But anyone on the ground in **Silicon Valley** knows that a full-blown war for talent is under way, with checkbooks blazin.

- Government officials and tech oligarchs contacted members of the National Venture Capital association (NVCA) and created national “black-lists” to blockade Plaintiffs from receiving investor funding. This was also confirmed in a widely published disclosure by Tesla Motors Daryl Siry and in published testimony. If Silicon Valley political campaign finance oligarchs black-list you (see the "AngelGate" Scandal and the "High Tech No Poaching Class Action Lawsuit" cases) you will never get investor funding again.

**HARM: DEFENDANTS ORDERED FOIA OBFUSCATION OF Plaintiffs FOIA AND STILL HAVE NOT RESPONDED TO MANY FOR YEARS BECAUSE THEY SHAME DEFENDANTS:**

Federal FOIA requests were hidden, frozen, stone-walled, delayed, lied about and only partially responded to in order to seek to hide information and run cover-ups. In once instance, even though GOVT FOIA staff had the requested FOIA files in their top desk drawers, they delayed handing the FOIA copies over for nearly a decade in order to run a cover-up.



**HARM: DEFENDANTS ENGAGED IN ARBITRARY DEADLINE MANIPULATION:**

Crony state and federal officials play an endless game of Catch-22 by arbitrarily determining that deadlines had passed that they, the government officials, had stonewalled and obfuscated applications for, in order to force these deadlines that they set, to appear to be missed.

**HARM: POLITICAL POISONING & TOXIC EXPOSURE BY DEFENDANTS HARMED Plaintiffs:**

Plaintiffs were found to be strangely poisoned, not unlike the Alexander Litvenko case, The Salisbury Case and hundreds of other political poisoning cases. Heavy metals and toxic materials were found right after Plaintiffs work with The U.S. Government weapons and energy facilities. Many wonder if Plaintiffs was intentionally exposed to toxins in retribution for their testimony. The federal MSDS documents clearly show that a number of Plaintiffs were exposed to deadly compounds and radiations, via GOVT, without being provided with proper HazMat suits which GOVT officials knew were required. Plaintiffs was awarded an exceptional number of issued patents on the energy technologies he had developed for the Dept of Energy. 3rd Party outside legal valuation experts appraised the value of these patents at over \$200,000.000.00. The patents, clearly visible in full detail, on the US Patent office website, list many of the chemicals and compounds Plaintiffs was working with without adequate hazmat resources of Sandia, Argonne or other National Labs safety oversight.

**HARM: WORKPLACE SABOTAGE AND OBSTRUCTION OF Plaintiffs RIGHT TO WORK:**

Plaintiffs contacts at ARTECH and KAISER PERMANENTE were called, and faxed, and ordered to fire target Plaintiffs from their places of employment, in the middle of the day, with no notice, as a retribution tactic.

**HARM: MEDIA ASSASSINATION PROGRAMS WERE CONTRACTED BY DEFENDANTS TO HARM Plaintiffs:**

On orders from Obama White House officials Google, YouTube, Gawker Media and Gizmodo Media produced attack articles. Google locked these contrived attack articles from the Nicholas Guido Denton tabloid empire on the top line, of the front page of all Google searches for a decade in front of 7.5 billion people, around the world. This attack-type uses over \$40 million dollars in server farms, production costs and internet rigging. The forensic data acquired from tracking some of these attacks proves that Google rigged these attacks against Plaintiffs on the internet and that all of Google's "impressions" are manually controlled by Google's executives who are also the main financiers and policy directors of the Obama Administration. This data was provided to the European Union for its ongoing prosecution of Google's political manipulation of public perceptions. Hired attackers Nicholas Guido Denton, John Herman, Adrian Covert, Ian Fette, Patrick George, Gabrielle Darbyshire and John Cook have been referred to the FBI for surveillance, tracking and interview relative to the command, control and compensation for those attacks.

**HARM: COMMERCIAL EMPLOYMENT DATABASE POISONING AND RED-FLAGGING OF Plaintiffs HR DATABASE REFERENCES WERE CREATED TO HARM Plaintiffs INCOME POTENTIAL:**

Plaintiffs HR and employment records, on Taleo, Palantir and EVERY recruiting and hiring database, was embedded with negative keywords and "flags" in order to prevent the Plaintiffs from ever gaining future employment.

**HARM: ATTEMPTS ON THE LIVES OF WHISTLE-BLOWERS BY DEFENDANTS WERE MEANT TO FRIGHTEN Plaintiffs:**

Gary D. Conley, Seth Rich, Rajeev Motwani who Plaintiffs knew, and many other whistle-blowers in these matters, turned up dead under strange circumstances. Plaintiffs have received ongoing death threats for his help to federal investigations in the larger organized crime investigation relative to this matter. See the list of over 120 dead victims, lower down in this document, 1/3 of whom worked with Plaintiffs and were threatened in advance of

1 their deaths.

2  
3 ***HARM: DEFENDANTS ENGAGED IN REVENUE BLOCKADES AND INTERNET***  
4 ***INCOME RE-DIRECTION TO MINIMIZE Plaintiffs RESOURCES SO HE COULD NOT***  
5 ***FIGHT BACK:***

6 Paypal (A DNC-biased operation owned and operated by White House political campaign  
7 financiers) and other on-line payments for on-line sales by Plaintiffs are de-platformed,  
8 delayed, hidden, or re-directed in order to terminate income potential for target who  
9 competed with the attackers interests and holdings. This further denied Plaintiffs income. As  
10 a test, Plaintiffs built an online store with hundreds of thousands of products and marketed it  
11 globally. Trackers, placed by Plaintiffs technicians, on servers, discovered that Paypal and  
12 an outside "Virgina-based system" were DNS and payment re-directed all traffic away from  
13 the store so that Plaintiffs received no traffic and no income. In DNS redirection, "website  
14 spoofing" sends target Plaintiffs websites to dead ends where no sales orders or customer  
15 inquiries actually get back to the target. These internet revenue activity manipulations are  
16 conducted using outside covert servers operated by the attackers and revealed in the  
17 Snowden Leaks. All commercial storefronts and on-line sales attempts by target Plaintiffs,  
18 had their sites hidden, or search engine de-linked by a massively resourced facility located in  
19 Virginia, Texas or Palo Alto, California in order to terminate revenue potentials for the  
20 Plaintiffs.

21 ***HARM: DEFENDANTS USED THE TROLL FARM DEPLOYMENTS AGAINST Plaintiffs***  
22 ***THAT THEY USE AGAINST PRESIDENTIAL OPPOSITION CANDIDATES:***

23 Contracted trolls, shills, botnets and synth-blog deployments are deployed to place  
24 defamatory statements and disinformation about Plaintiffs in front of 7.5 billion people  
25 around the world on the internet in order to seek to damage their federal testimony  
26 credibility by a massively resourced facility. Some of these troll farms were uncovered in  
27 Russia, Ukraine, Israel and Brazil. Renown author Farrow writes about this technique in his  
28 book: ***"Catch And Kill"***. **FUSION GPS, BLACK CUBE and MEDIA MATTERS**  
Brand, Reputation and Credibiity "KILL" CONTRACTS were executed by Defendants

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1 targeting Plaintiffs. Campaign finance dirty tricks contractors were hired by campaign  
2 financiers to attack the friends and family members of the target Plaintiffs in order to create  
3 low morale for the target Plaintiffs psyche and motivation. The Fusion GPS Scandal  
4 implicates Gawker and Gizmodo Media In Pay-To-Publish Scheme. A court filing from the  
5 U.S. district court for DC shows that Fusion GPS paid several journalist to run hit jobs on  
6 political adversaries and was paid by a media organization. All of those players were  
7 attackers hired to attack Plaintiffs. FBI interviews can verify this.

8  
9 ***HARM: MANUAL SEARCH ENGINE LOCK-IN ATTACKS WERE CONTRACTED FROM  
GOOGLE AND YOUTUBE, BY DEFENDANTS, TO HARM Plaintiffs:***

10 In one case covert political partner: Google, transferred large sums of cash to dirty tricks  
11 contractors and then manually locked the media portion of the attacks into the top lines of  
12 the top pages of all Google searches globally, for years, with hidden embedded codes in the  
13 links and web-pages which multiplied the attacks on Plaintiffs by many magnitudes.

14  
15 ***HARM: THE U.S. PATENT OFFICE MANIPULATION WAS USED TO BLOCKADE  
16 REVENUE FROM Plaintiffs INVENTIONS:***

17 Facebook and Google executives sit on the boards and run The United States Patent Office.  
18 That fact alone says it all. For details see <https://www.usinventor.org>

- 19 • Covert Cartel financier: Google, placed Google's lawyer: Michelle Lee, in charge of the  
20 U.S. Patent Office and she, in turn, stacked all of the U.S. Patent Office IPR and ALICE  
21 review boards and offices with Google-supporting employees in order to rig the U.S. Patent  
22 Office to protect Google from being prosecuted for the vast patent thefts that Google  
23 engages in. Google has hundreds of patent lawsuits for technology theft and a number of  
24 those lawsuits refer to Google's operations as "Racketeering", "Monopolistic Cartel" and  
25 "Government Coup-like" behaviors. Thousands of articles and investigations detail the fact  
26 that Google, "essentially" ran the Obama White House and provided over 80% of the key  
27 White House staff. A conflict-of-interest unlike any in American history. Google's investors  
28 personally told Plaintiffs they would "kill him". Google and the Obama Administration were

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1 “the same entity”. Plaintiffs testified in the review that got Michelle Lee terminated and  
2 uncovered a tactical political and social warfare group inside Google who were financed by  
3 Federal and State funds. For additional proof, SEE THE VIDEO at:

4 [The Battle to Save Inventing.m4v](#)

5  
6 Silicon Valley has taken over the U.S. Patent Office with lobbyists and influence payments.  
7 Per Randy Landreneau, the President the U.S. Inventor guild: “ *Independence Day is that*  
8 *special time when we Americans remember and celebrate our country's freedom. While it*  
9 *may mean different things to many people, suffice to say, it is the reason we are Free, we*  
10 *have Liberty.* Founder, writer, statesman and inventor Benjamin Franklin wrote, "On  
11 Historical occasions, Questions of Right and Wrong, Justice and Injustice, will naturally  
12 arise." Here, on this honored day, we take a quick look at Invention and our Independence.  
13 Towards the beginning of the Declaration of Independence, whose principal author was our  
14 eventual third president, Thomas Jefferson, the very purpose of our Founders' quest was  
15 established. It is stated: "We hold these truths to be self-evident, that all men are created  
16 equal, that they are endowed by their Creator with certain unalienable Rights, that among  
17 these are Life, Liberty and the pursuit of Happiness." These were men and women of  
18 incredible vision, of intense courage, and they succeeded in accomplishing their seemingly  
19 insurmountable task, rising up and defeating perhaps the most powerful global Empire of the  
20 time, Great Britain. The United States of America eventually became the beacon of hope  
21 and individual freedom around the world. People from virtually every land came to this  
22 country to seek the American Dream, which ideals include individual and property rights,  
23 religious freedom, liberty, equality and the opportunity for upward mobility, achieved  
24 through dedication and hard work. One of the reasons America became the world leader in  
25 nearly all categories is due, in no small part, to how our Founders recognized and  
26 encouraged invention and innovation. They understood what builders, creators and designers  
27 could mean to a small, fledgling country with such a noble purpose. After declaring our  
28 independence and fighting a long and bloody war to establish it, our Founders gathered once



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again in Philadelphia for the Constitutional Convention to form a government that would embody those ideals embodied in our Declaration of Independence. The Father of our Constitution and eventual fourth President, James Madison wrote, in Federalist 43 (January 23, 1788): "A power 'to promote the progress of science and useful arts, by securing, for a limited time, to authors and inventors, the exclusive right to their respective writings and discoveries.' "The utility of this power will scarcely be questioned. The copyright of authors has been solemnly adjudged, in Great Britain, to be a right of common law. The right to useful inventions seems with equal reason to belong to the inventors. The public good fully coincides in both cases with the claims of individuals. The States cannot separately make effectual provisions for either of the cases, and most of them have anticipated the decision of this point, by laws passed at the instance of Congress." Thus, within our U.S. Constitution is that short item, located in Article I Section 8 as Clause 8: "To promote the Progress of Science and useful Arts, by securing for limited Times to Authors and Inventors the exclusive Right to their respective Writings and Discoveries." That clause is, in reality, a significant and powerful part of the American Dream, allowing people from all walks of life who have a bright and useful idea to capitalize on their innovations and creations. For more than two centuries that which our Founders established for inventors and patent holders held true, for the most part. However, the biggest blow to true Independence for Inventors came with passage of the America Invents Act of 2011 (AIA). Due to ambiguous language and loopholes in that piece of legislation, multinational conglomerates and Big Tech have all but wiped out what our Founders had set up, which they hoped would endure - patent holder property rights. When any form of poor legislation is passed and enacted we are reminded of what Samuel Adams, Sons of Liberty founder and a leader of the Boston Tea Party, said; "The grand end of civil government, from the very nature of its institution, is for the support, protection, and defense of those very rights; the principal of which, as is before observed, are Life, Liberty, and Property."

Indeed, Jefferson states it quite succinctly, "Our legislators are not sufficiently apprized of the rightful limits of their power; that their true office is to declare and enforce only our

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1 natural rights and duties, and to take none of them from us.” Madison adds to that, “A  
2 Government is instituted to protect property of every sort...This being the end of  
3 government, that alone is a just government, which impartially secures to every man,  
4 whatever is his own.” As we celebrate Independence Day, and all that our Founders  
5 provided for our great country, we at US Inventor are working to correct the wrongs and  
6 injustices that have befallen inventors, particularly since the AIA was enacted, by  
7 revitalizing the spirit of our Declaration of Independence (“...Life, Liberty and the pursuit of  
8 Happiness.”) through restoration of patent rights and protection as guaranteed in Article I  
9 Section 8 Clause 8 of our United States Constitution (“securing, for a limited time, to ...  
10 inventors, the exclusive right to their respective ... discoveries.”). We will not rest until the  
11 rights of inventors have been restored. We're gaining ground, but our enemies are powerful.  
12 We need your help in forwarding our cause and becoming involved when it matters. This  
13 isn't just for us, it's for our children, our grandchildren, and the future existence of the  
14 American Dream.”

15 Silicon Valley oligarchs have spent billions of dollars to put their people inside the United  
16 States Patent Office and to manipulate patent rulings in order to harm WITNESS and his  
17 peers for the purposes of: 1.) cheating instead of competing by stealing technologies and not  
18 paying for them and, 2.) operating reprisal, vendetta, retaliation campaigns against  
19 competitors and political enemies. Plaintiffs was awarded an exceptional number of issued  
20 patents on the energy technologies he had developed for the Dept of Energy. 3rd Party  
21 outside legal valuation experts appraised the value of these patents at over \$200,000.000.00.  
22 By it's actions, The U.S. Government made Plaintiffs patents unusable for monetization by  
23 causing black-listing of those patents with NVCA investors and by using online trolls to  
24 make the marketing for those patents close off. Plaintiffs demands that the U.S. Government  
25 now purchase ALL of Plaintiffs patents at fair market value to partially offset his loss.

26  
27 ***HARM: HONEY-TRAPS WERE PLACED ON SOCIAL MEDIA SITES BY DEFENDANTS  
28 SPY OPERATIVES TO HARM Plaintiffs:***

“Honeytraps” and moles were employed by the attackers. In this tactic, people who covertly

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1 worked for the attackers were employed to approach the "target" in order to spy on and  
2 misdirect the subject. Match.com and other dating sites are owned by famous politicians and  
3 election campaign financier involved with Jeffrey Epstein and those sites were used to  
4 source girls for Epstein and Honey-traps to lure political adversaries.

5  
6 ***HARM: A FAKE NEWS TABLOID EMPIRE WAS CREATED JUST FOR DEFAMATION  
ATTACKS, BY DEFENDANTS, AND USED TO HARM Plaintiffs:***

7 Gawker Media, Gizmodo Media, Snopes, SPLC and other hired media assassins were  
8 retained to produce "hatchet job" character assassination articles about Plaintiffs. Then those  
9 articles were faxed, mailed and emailed to Kaiser Permanente and investors with a note  
10 saying: "You don't want to have anything to do with this person, do you..?" in order to get  
11 Plaintiffs fired from their job and get Plaintiffs loans or financing pulled. The attackers use  
12 their round one attack media, that they authored, to create a round two second wave attack  
13 designed to end Plaintiffs life status via economic warfare. All of the other attack victims  
14 received between \$100,000.00 to \$75,000,000.00 but Plaintiffs received ZERO DOLLARS  
15 because the Judge was friends with the Defendants.

16  
17 ***HARM: HOUSING BLOCKADES WERE DEPLOYED BY DEFENDANTS TO HARM  
18 Plaintiffs:***

19 Mortgage and rental applications had red flags added to them in databases to prevent the  
20 targets from getting homes or apartments. HUD applications were manipulated or stalled  
21 from 2007 to today, as reprisal.

22  
23 ***HARM: HACKING OF Plaintiffs DEVICES OCCURRED ON ORDERS OF  
24 DEFENDANTS:***

25 Krebs On Security, Wired, Ars Technica, The Wall Street Journal and most major IT  
26 publications have reported that hundreds of spy "back-doors" have been found on every  
27 Intel, AMD, Apple, Xfinity, Cisco, Microsoft, Juniper Networks motherboard, chip-set and  
28 hardware component set. This means that the attackers used a "key" code can open any of  
Plaintiffs computer, server, router, cloud-network or other network connected device and

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1 read every file, photo, video, your calendar and email on devices at any time from any  
2 location on Earth. This has been widely reported on by Glenn Greenwald, Edward Snowden,  
3 Scahill, Cheryl K of CBS News and others. Plaintiffs was hacked at least 10 times. In a  
4 number of instances, people, who Plaintiffs had been communicating with online, were  
5 mysteriously contacted by a third party who sent them the Gizmodo attack article or phoned  
6 them with warnings to avoid Plaintiffs. These kinds of Man-In-The-Middle interceptions  
7 would only have been possible from hacking and MITM surveillance tactics.

8  
9 ***HARM: TECH INDUSTRY BLACK-LIST COORDINATION AGAINST Plaintiffs HAD  
COMMAND-AND-CONTROL OUT OF DEFENDANTS OFFICES:***

10 McCarthy-Era "Black-lists" were created and employed against target Plaintiffs who  
11 competed with Obama Administration executives and their campaign financiers to prevent  
12 them from getting funding and future employment. This White House process is known as  
13 "RatFucking", a tactic that is documented in a variety of published reports and on  
14 Wikipedia. Using Gust, Google Docs, Dropbox and secret meetings, a black-list has been  
15 maintained to attack Plaintiffs for whistle-blowing. Plaintiffs have named specific  
16 individuals to this court and demanded that the Court request the FBI 302 reports on those  
17 individuals. Additional, Plaintiffs demands the FINCEN financial mapping records for those  
18 Defendant parties. That data, cross referenced in the XKEYSCORE database, provides  
19 indisputable, fully incriminating, follow-the-money evidence about every single party  
20 mentioned in this complaint.

21  
22 ***HARM: HUD AND USDA MORTGAGE RIGHTS BLOCKADES TO HARM Plaintiffs  
HOUSING IN REPRISAL AS DIRECTED BY DEFENDANTS VIA THEIR 'DIRTY TRICKS'  
TEAM:***

23  
24 The housing rights of Plaintiffs were stalled in reprisal. Public records show that tens of  
25 thousands of other Plaintiffs were moved ahead of Plaintiffs even though Plaintiffs  
26 validation metrics exceeded those of almost every other Plaintiffs. Plaintiffs was "black-  
27 listed".  
28

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1. Additional 'dirty tricks' efforts were used per:  
<https://www.justice-integrity.org/634-intelligence-agencies-use-social-media-for-dirty-tricks-propaganda-new-report>
2. <https://www.commondreams.org/news/2014/02/07/gchqs-dirty-tricks-revealed-false-flags-virus-attacks-and-honey-traps>
3. <https://theintercept.com/2014/02/24/jtrig-manipulation/>
4. [https://www.salon.com/2011/02/11/threats\\_against\\_glenn\\_greenwald\\_wikileaks/](https://www.salon.com/2011/02/11/threats_against_glenn_greenwald_wikileaks/)
5. <https://www.theguardian.com/commentisfree/2013/jun/24/surveillance-us-national-security>
6. <https://www.straight.com/news/482846/government-trolls-use-psychology-based-influence-techniques-social-media>
7. [http://federal-report.com/public/The\\_Political\\_Reprisal\\_Vendetta\\_Playbook.pdf](http://federal-report.com/public/The_Political_Reprisal_Vendetta_Playbook.pdf)
8. <https://thedailybanter.com/2014/02/05/greenwalds-latest-snowden-revelation-the-british-gchq-is-waging-war-on-hackers/>
9. <https://www.cia.gov/library/readingroom/docs/CIA-RDP89-01258R000100010002-4.pdf>
10. ...and thousands of additional reports proving the attacker assertions.

### JUDICIAL CONFLICT OF INTEREST NOTICE

Be it hereby known that any Judge, Magistrate or Court officer who owns, or has family who owns, stock market securities in VALIC/AIG, Tesla Motors, Facebook, SpaceX, Google, Alphabet, YouTube, Netflix, Linkedin or NASDAQ 'FANG' stocks shall be disqualified from this case per FINCEN, FTC, DOJ and case investigations and the financial and political conflicts of interest in those pending Defendants and their RICO law and Anti-Trust law violating schemes.

**Plaintiffs hereby also pleads with the Court for:**

**(B) Plaintiffs requests verification that no judge or magistrate holds tock ownership, or personal relationships, in Valic/AIG or the Silicon Valley Cartel companies who are DOE and ROE affiliated insiders;**

Plaintiffs hereby places a motion before the Court to request multi-Court official public review for non-bias of judiciary personnel involved in this case. Plaintiffs have dated sitting judges in the regional courts and sitting judges have dated Plaintiffs ex-girlfriend. A well known sitting judge

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1 used to spend many nights at Plaintiffs home. Additionally, trillions of dollars of conflict-of-interest  
2 government funds and high tech stock market funds are involved in the Master Complaint which,  
3 obviously, opens the door for bribery. Additionally, America is currently in a political civil war and  
4 many of the judicial officers have friends who are either friends or co-investors of the Defendants  
5 for political or financial reasons. Thus, conflicts of interest are rife in this case. Hence, the demand  
6 for a Jury Trial. Court examples of these concerns include a previous case where Plaintiffs was  
7 forced to seek to move the court for an order transferring a cause and all of its pending and future  
8 motions to an unbiased and disinterested Judicial Officer for the Court. Ie: this text from DOJ and  
9 the previous case matters:

- 10  
11 1. *This motion is filed pursuant to C.R.C.P. 97, the Canons of Judicial Conduct, and state and*  
12 *federal constitutional guarantees to due process of law, equal protection of the law, and a*  
13 *fair hearing and trial.*
- 14 2. *There is sufficient evidence to prove that Judge XXXX is not an impartial or qualified judge*  
15 *in this case. The facts to support this motion are stated in the attached affidavit.*
- 16 3. *The framers of the Fourteenth Amendment stressed that the due process and equal*  
17 *protection clauses created a right to a fair and impartial hearing and trial. Courts have*  
18 *repeatedly held that an impartial judge is an indispensable element of that right. The*  
19 *attached Affidavit shows both bias and prejudice in fact and in appearance, and a lack of*  
20 *legal qualification and temperament to preside in this case. Each alone is sufficient to*  
21 *require the judge's disqualification and recusal.*
- 22 4. *Due process demands a fair and impartial hearing by a neutral and detached magistrate.*  
23 *Gerstein v. Pugh, 420 U.S. 103 (1975); Ward v. Village of Monroe, 409 U.S. 57, 62*  
24 *(1972). A right to an impartial judge is so basic to due process that courts can never treat its*  
25 *infraction as a harmless error. Chapman v. California, 386 U.S. 18, 23 (1967). "...the*  
26 *tribunals of the country shall not only be impartial in the controversies submitted to them*  
27  
28



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- 1 but shall give assurance that they are impartial...” *Berger v. the United States*, 255 U.S. 22,  
2 35-6 (1921).
- 3 5. Rule 1.2 states “Promoting Confidence in the Judiciary - A judge shall act at all times in a  
4 manner that promotes public confidence in the independence, integrity, and impartiality\* of  
5 the judiciary, and shall avoid impropriety and the appearance of impropriety.”
- 6 6. Judge XXXX has a duty to promote confidence in the judiciary.
- 7 7. Plaintiffs does not feel that the present judge will act independently, with integrity and  
8 impartiality regarding the present case of Plaintiffs.
- 9 8. Actual improprieties include violations of law, court rules or provisions of this Code. The  
10 test for appearance of impropriety is whether the conduct would create in reasonable minds  
11 and a perception that the judge violated this Code or engaged in other conduct that reflects  
12 adversely on the judge’s honesty, impartiality, temperament, or fitness to serve as a judge
- 13 9. Rule 1.3 provides the standard. Rule 1.3 states that “Avoiding Abuse of the Prestige of  
14 Judicial Office - A judge shall not abuse the prestige of judicial office to advance the  
15 personal or economic interests\* of the judge or others or allow others to do so.”
- 16 10. The presiding judge as a judicial office has an economic interest in this matter. It would be  
17 unfair and unreasonable if this Judge would be allowed to preside over this case matter.
- 18 11. Rule 2:2 provides:
- 19 **Impartiality and Fairness.** A judge shall uphold and apply the law and shall perform  
20 all duties of judicial office fairly and impartially.
- 21 12. Pursuant to Rule 2.2, the judge should not give self-represented litigants an unfair  
22 advantage or create an appearance of partiality to the reasonable person; however, in the  
23 interest of ensuring fairness and access to justice, judges should make reasonable  
24 accommodations that help litigants who are not represented by counsel to understand the  
25  
26  
27  
28

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proceedings and applicable procedural requirements, secure legal assistance, and be heard according to law.

13. The Plaintiffs are representing himself. Plaintiffs are disabled and blind but seeks to have his rights adjudicated because of the unfair advantage of the judge along with the actual possible actions of impartiality.

14. The rules for disqualification for a judge are set out in Rule 2:11 for Disqualification.

15. Rule 2:11(A). A judge shall disqualify himself or herself in any proceeding in which the judge's impartiality\* might reasonably be questioned, including but not limited to the following circumstances.

16. Rule 2:11 (A)(1) The judge has a personal bias or prejudice concerning a party or a party's lawyer or personal knowledge\* of facts that are in dispute in the proceeding.

17. Under this Rule, a judge is disqualified whenever the judge's impartiality might be questioned, regardless of whether any of the specific provisions of paragraphs (A)(1) through (6) apply. (Rule 2:11 -Comment 1)

18. This Judge should be disqualified because his impartiality is reasonably questioned. Plaintiffs will not receive a fair trial under his jurisprudence

19. Comment 2 in Rule 2:11 states "a judge's obligation not to hear or decide matters in which disqualification is required applies regardless of whether a motion to disqualify is filed."

20. At least by the time of his failure to follow the mandamus of the D.C. Circuit panel and his decision regarding the Plaintiffs case. The Court for In re Al Nashin stated that \_ "it cast an intolerable cloud of partiality over his subsequent judicial conduct" and "risk[ed] [] undermining the public's confidence in the judicial process." In re Al Nashiri, 921 F.3d 224, 237, 239 (D.C. Cir. 2019)

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- 1 21. “[A]ll that must be demonstrated to compel recusal,” then, is “a showing of an appearance  
2 of bias...sufficient to permit the average citizen reasonably to question a judge’s  
3 impartiality.”” *Id.* at 234
- 4 22. The circumstances of this case lead any reasonable observer to believe that the current  
5 judge has a personal interest in the outcome, is irreparably biased against the Plaintiffs. His  
6 continued presence in the case may become a national scandal undermining confidence in  
7 the impartiality of the judicial system and faith in the rule of law writ large.
- 8 23. The Constitution compels, and all statutory bases require (“shall recuse”), that Judge  
9 Sullivan recuse himself from any further proceeding
- 10 24. Even more fundamentally, due process guarantees “an absence of actual bias” on the part  
11 of a judge. *In re Murchison*, 349 U.S. 133, 136 (1955). Because bias is “easy to attribute to  
12 others and difficult to discern in oneself,” the Supreme Court has imposed an objective  
13 standard here, too, that asks whether “as an objective matter, the average judge in his  
14 position is ‘likely’ to be neutral, or whether there is an unconstitutional ‘potential for  
15 bias.’” *Williams v. Pennsylvania*, 136 S. Ct. 1899, 1905 (2016)
- 16 25. Notably, if Plaintiffs case goes forth in the presiding court, it is very possible that he will  
17 receive a biased and unfair judgment.
- 18 26. In order for the wheels of justice to be maintained at all levels, it is imperative that this  
19 Judge be removed.
- 20 27. Recusal is required whenever there exists a genuine question concerning a judge’s  
21 impartiality,” regardless of whether the question arises from an extrajudicial source. *Id.*,  
22 citing *Berger v. United States*, 255 U.S. 22, 28 (1921)
- 23 28. Judges are to decide cases based solely upon the facts and arguments presented by the  
24 parties’ counsel through the judicial process
- 25  
26  
27  
28

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29. Plaintiffs will not give a fair trial because it is quite possible that the judge will not decide the case solely upon the facts. The Judge makes take his own self-interest in the case.

30. Even appearance of bias or prejudice is sufficient grounds for disqualification. It is an abuse of discretion and reversible error if that judge does not withdraw from the case even though he believes the statements are false or that the meaning attributed to them by the party seeking justice.

31. A judge should “recuse himself whenever...he believes his impartiality can reasonably be questioned.” A.B.A. Standards, *The Function of the Trial Judge*, 1.7. Departure from this principle shocks the sense of justice

Plaintiffs would respectfully request that this Court recuse the present judge presiding and assign the Plaintiffs case before another Court. The transfer of Plaintiffs case will ensure the integrity of the Court. Foremost, a reassignment of the case by this Motion to Recuse will assist in promoting equity and justice.

***Facts Of The Bias Concern Matter:***

Whereas White House executives, U.S. Senators, and Government agency executives colluded with Silicon Valley oligarchs, operating, together, as an “Enterprise”, to coordinate insider stock market ‘Stimulus Scams’ that involved funding blockades, blacklists, contracted tabloid media assassinations and RICO Racketeering law violations, Anti-trust law violations, IP law violations, lobbying law violations and various civil and criminal acts that harmed domestic citizens and Democracy. This case matter is well known to Courts, media, federal law enforcement and in nearly a million news articles. It is not possible for this Judge, who knows many of the participants in this case, to not have seen the conflict of interest herein, at first blush. A simple cross-comparison of the ICIJ, FINCEN, Interpol, SEC, GAO forensic accounting and XKEYSCORE, et al, databases proves

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1 the illicit financial interactions between Defendants. Such a check can be technically accomplished  
2 within 60 minutes, or less, according to federal IT experts. Almost every single investor of Elon  
3 Musk is also the primary financier and beneficiary of the politicians, and their Congressional  
4 shenanigans, that used taxpayer money and resources to give Musk's companies all that free money.  
5 For example, Dianne Feinstein's family run the HR service (Herb Newman), the construction  
6 company, the railroads, the building leases (CBRE), the China funds (Mart Bailey, Steve Westly,  
7 Steve Spinner, et al) and swap staff members for Tesla and Solyndra. Feinstein and Pelosi blocked  
8 funding for all Tesla competitors for the same State and Federal cash and tax waivers and for the  
9 NUMMI factory. The California and Washington, DC politicians, personally, made billions off  
10 insider trading, pump-and-dumps and payola. Felonies? You Bet! Valic, who the Judge invests  
11 massively, with, runs part of the Tesla and Elon Musk cash.  
12

13  
14 Reporters and family members of California politicians, including U.S. Senators, **who Plaintiffs**  
15 **have a personal relationship with and knows the staff of**, have contacted Plaintiffs. Based on  
16 current investigative information, federal finance reports on the Judge's sources of income from  
17 stock market investments, speakers fees and other sources and social media postings, photographs  
18 and social photography archives from Getty, Drew Altizer and related Washington, DC 'high-  
19 society' photographers there appears to be conflicts of interest between Chief Judge XXXX D XXXX  
20 and this case. Senators Dianne Feinstein, Nancy Pelosi, Kamala Harris, Harry Reid (Deceased, but  
21 records acquired), White House staff, and other related parties, appear to have given orders to the  
22 Judge's office to "Stop this case no matter what.." stating that "This will cut off the stock market  
23 income of 90% of the DNC..". As Chief Judge XXXX D XXXX is a renown spokesperson and  
24 speaker for the DNC and this case has the potential to cause the arrest, indictment, censure,  
25 Congressional charges of Contempt, and other hardships for "90% of the DNC", there is a  
26  
27  
28

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1 reasonable assumption, that any person of average intelligence could make, that this Judge is  
2 overly conflicted in this matter.

3  
4 As one of the founders of the “Anti-corruption Party”, there are also basic conflicts of interest  
5 between the “Anti-corruption Party’s” : “NO Public Official, or their family, should own stock  
6 market assets because that is how bribes are paid” stance and the DNC’s stance, per Nancy Pelosi,  
7 that: “All public officials and judges should get stock market perks”. The Plaintiffs are an active  
8 proponent of the Expansion, FBI enforcement and application of the federal STOCK ACT, which  
9 most of the opposition are in violation of.  
10

11  
12 Facebook, Google, Alphabet, Tesla Motors, SpaceX and other Big Tech companies as well as the  
13 Senators mentioned, co-partnered in the government criminal endeavors mentioned in this case.  
14 Reporters have stated to Plaintiffs that financial disclosures indicate that those who own direct, or  
15 mutual funds, together, in this entities are Defendants and ‘enemies’ of the Plaintiffs. Plaintiffs and  
16 advisors request that the Judge Swear, Warrant and Certify that they, or their partner own no  
17 stocks or interests in any “Big Tech” companies and that the points in the affiliated insider  
18 Senator’s financial disclosures (Per <https://www.openthebooks.com>,  
19 <https://sunlightfoundation.com/>, and Senate Investigators) do not cross over in the Judge’s finance  
20 disclosure in any non-coincidence manner.  
21

22 The federally documented reports, below, prove that the number one way to bribe Judges  
23 and public officials is via Dark Money stock market transactions and covert Mutual Funds  
24 ‘packing’.  
25

26 Such conflicts cannot even have a hint of possibility in a case this important to every  
27 American citizen.

28 How can you ever trust a single judge to rule fairly on a case involving famous politicians



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1 and notorious millionaires that the Judge knows, parties with, co-invests with and gets political  
2 perks from?

3       There is a pandemic of crooked, bribed, judges in America as the following evidence shows.

4 We must not give leverage to ANY possibility that a Judge could be influenced.

5 The Judge has confirmed, herself, extensive investments in: Valic Large Cap Investment Fund,  
6 Valic Mid Cap Investment, Fund, Valic Small Cap Investment Fund, Valic Global & Internat'l  
7 Equity Fund, Valic Specialty Fund, Valic Fixed Income which are investment fronts for Google,  
8 Alphabet, Tesla and the other corrupt companies who are DOE/Defendants in this case and are  
9 under federal criminal investigations and those companies are regulated by the Senators and White  
10 House officials charged in these crimes. The United States Government has sued 'Valic', over and  
11 over, for a variety of misdeeds and dirty financial tricks. 'Valic' recently had to change their name  
12 in order to try to ward off more bad press, just like crooked 'Facebook' changed it's name to  
13 'Meta' in order to try to ward off more bad press from Facebook being outed as a corruption  
14 empire. The new name of Valic is "AIG Retirement Serices".  
15  
16  
17

18 Readers will recall that in the 2007-2008 "stimulus scam" a certain contingent of Congress people  
19 insisted that a company called AIG should get handed a massive load of free taxpayer cash. As we  
20 all know by now, insurance giant AIG sparked national outrage by paying more than \$165 million  
21 in executive bonuses after receiving a \$170 billion taxpayer bailout in the last "Stimulus Scam".

22 What fewer people know is that AIG gave more than \$9 million in campaign contributions to  
23 Congress and the Congress People that lobbied FOR the AIG give-away were the people who AIG  
24 gave political resources to. Valic/AIG is suspected to be a money-laundering Dark Money route  
25 between Big Tech and members of Congress.  
26

27  
28 Plaintiffs provided information and research to Robert Simon, the Producer for CBS News 60

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1 Minutes TV investigative show. 60 Minutes produced segments deeply relevant to this case  
2 including: Congress Trading On Insider Information; The Lobbyists Playbook; The Cleantech  
3 Crash; The Data Brokers and others. The pertinent sections of those news items can be viewed in  
4 the film: How Political Corruption Works.

5 Robert (Bob) Simon, the producer of this report, was killed in a suspicious car crash.  
6 Bystanders described someone leaning into the car, at the crash, and spraying something.

7 This information was publicly available to The Judge, for years, prior to this case and was  
8 publicly discussed among the Judges peers and associates, to this day:  
9

10 Washington, D.C. is a town that runs on inside information - but should our elected officials  
11 be able to use that information to pad their own pockets? As Steve Kroft, Bob Simon's peer at 60  
12 Minutes, reports, members of Congress and their aides have regular access to powerful political  
13 intelligence, and many have made well-timed stock market trades in the very industries they  
14 regulate. For now, the practice is perfectly legal, but some say it's time for the law to change.  
15

16 Even if a Judge or Senator denies that they could be influenced by personal favorites or by  
17 stocks that all of their friends own, Psychology proves that assertion to be virtually impossible to be  
18 believed. Judges, or public officials would not deny that they subconsciously assert influence in a  
19 school to make sure their child has the best treatment and that kids that bully their child get the  
20 most punishment. Why should anyone think a Judge or Senator would not consciously, or  
21 subconsciously, assert influence over something that buys them mansions, trips to the Virgin Islands  
22 and sexy parties?  
23

24 Judges and Senators in this case are either financed by, friends, with, sleeping with, dating  
25 the staff of, holding stock market assets in, promised a revolving door job or government service  
26 contracts from, partying with, personal friends with, photographed at private events with,  
27 exchanging emails with, business associates of or directed by; our business adversaries, or the  
28 Senators and politicians that those business adversaries pay campaign finances to, or supply

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1 political digital search manipulation services to. Criminal U.S. Senators coordinated and profited  
2 in these schemes. Their own family members, who Plaintiffs, and his peers know personally, have  
3 now supplied evidence against them.

4 In one published report where Steve Kroft was the correspondent, with Ira Rosen and  
5 Gabrielle Schonder as producers, it was shown that, for national elections, public officials,  
6 including congressmen and senators are expending much of their time and their energy raising the  
7 millions of dollars in campaign funds they'll need just to hold onto a job that pays \$174,000 a year.

8 Few of them are doing it for the salary and all of them will say they are doing it to serve the  
9 public. But there are other benefits: Power, prestige, and the opportunity to become a Washington  
10 insider with access to information and connections that no one else has, in an environment of  
11 privilege where rules that govern the rest of the country, don't always apply to them.

12 Most former congressmen and senators manage to leave Washington - if they ever leave  
13 Washington - with more money in their pockets than they had when they arrived, and as you are  
14 about to see, the biggest challenge is often avoiding temptation. Judges lives are set according to  
15 which Senators, and other public officials are in office, Judges have even more incentive to rig  
16 political decisions because most of them own mansions they can't pay for with the speaker fees and  
17 stock perks their office provides.

18 Renown anti-corruption investigative reporter and witness: Peter Schweizer, was asked to  
19 comment:

20 Peter Schweizer: "This is a venture opportunity. This is an opportunity to leverage your  
21 position in public service and use that position to enrich yourself, your friends, and your family."

22 Peter Schweizer is a fellow at the Hoover Institution, a conservative think tank at Stanford  
23 University. A year ago he began working on a book about soft corruption in Washington with a  
24 team of eight student researchers, who reviewed financial disclosure records. It became a jumping  
25 off point for our own story, and we have independently verified the material we've used.  
26  
27  
28

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1       Schweizer says he wanted to know why some congressmen and senators managed to  
2 accumulate significant wealth beyond their salaries, and proved particularly adept at buying and  
3 selling stocks.

4       Schweizer: "There are all sorts of forms of 'honest' grafts that congressmen engage in that  
5 allow them to become very, very wealthy. So it's not illegal, but I think it's highly unethical, I think  
6 it's highly offensive, and wrong."

7       Steve Kroft: "What do you mean honest graft?"

8       Schweizer: **"For example insider trading on the stock market. If you are a member of**  
9 **Congress, those laws are deemed not to apply."**

10       Kroft: "So congressman get a pass on insider trading?"

11       Schweizer: "They do. The fact is, if you sit on a healthcare committee and you know that  
12 Medicare, for example, is-- is considering not reimbursing for a certain drug that's market moving  
13 information. And if you can trade stock on-- off of that information and do so legally, that's a great  
14 profit making opportunity. And that sort of behavior goes on."

15       Kroft: "Why does Congress get a pass on this?"

16       Schweizer: "It's really the way the rules have been defined. And the people who make the  
17 rules are the political class in Washington. And they've conveniently written them in such a way that  
18 they don't apply to themselves."

19       The buying and selling of stock by corporate insiders who have access to non-public  
20 information that could affect the stock price can be a criminal offense, just ask hedge fund manager  
21 Raj Rajaratnam who recently got 11 years in prison for doing it. But, congressional lawmakers  
22 have no corporate responsibilities and have long been considered exempt from insider trading laws,  
23 even though they have daily access to non-public information and plenty of opportunities to trade  
24 on it.

25       Schweizer: "We know that during the health care debate people were trading health care  
26  
27  
28

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1 stocks. We know that during the financial crisis of 2008 they were getting out of the market before  
2 the rest of America really knew what was going on.”

3 In mid September 2008 with the Dow Jones Industrial average still above ten thousand,  
4 Treasury Secretary Hank Paulson and Federal Reserve Chairman Ben Bernanke were holding  
5 closed door briefings with congressional leaders, and privately warning them that a global  
6 financial meltdown could occur within a few days. One of those attending was Alabama  
7 Representative Spencer Bachus, then the ranking Republican member on the House Financial  
8 Services Committee and now its chairman.

9  
10 Schweizer: “These meetings were so sensitive-- that they would actually confiscate cell  
11 phones and Blackberries going into those meetings. What we know is that those meetings were held  
12 one day and literally the next day Congressman Bachus would engage in buying stock options  
13 based on apocalyptic briefings he had the day before from the Fed chairman and treasury  
14 secretary. I mean, talk about a stock tip.”

15  
16 While Congressman Bachus was publicly trying to keep the economy from cratering, he was  
17 privately betting that it would, buying option funds that would go up in value if the market went  
18 down. He would make a variety of trades and profited at a time when most Americans were losing  
19 their shirts.

20 Congressman Bachus declined to talk to us, so we went to his office and ran into his Press  
21 Secretary Tim Johnson.

22  
23 Kroft: “Look we're not alleging that Congressman Bachus has violated any laws. All...the  
24 only thing we're interested in talking to him is about his trades. “

25 Tim Johnson: “Ok...Ok that's a fair enough request.”

26 What we got was a statement from Congressman Bachus' office that he never trades on non-  
27 public information, or financial services stock. However, his financial disclosure forms seem to  
28 indicate otherwise. Bachus made money trading General Electric stock during the crisis, and a

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1 *third of GE's business is in financial services.*

2 *During the healthcare debate of 2009, members of Congress were trading health care*  
3 *stocks, including House Minority Leader John Boehner, who led the opposition against the so-*  
4 *called public option, government funded insurance that would compete with private companies. Just*  
5 *days before the provision was finally killed off, Boehner bought health insurance stocks, all of*  
6 *which went up. Now speaker of the House, Congressman Boehner also declined to be interviewed,*  
7 *so we tracked him down at his weekly press conference.*

8  
9 *Kroft: "You made a number of trades going back to the health care debate. You bought*  
10 *some insurance stock. Did you make those trades based on non-public information?" "*

11 *John Boehner: "I have not made any decisions on day-to-day trading activities in my*  
12 *account. And haven't for years. I don't-- I do not do it, haven't done it and wouldn't do it."*

13 *Later Boehner's spokesman told us that the health care trades were made by the speaker's*  
14 *financial adviser, who he only consults with about once a year.*

15 *Peter Schweizer: "We need to find out whether they're part of a blind trust or not."*

16 *It turns out you CAN pay bribes, though, through Mutual Funds AND Blind Trusts.*

17 *Peter Schweizer thinks the timing is suspicious, and believes congressional leaders should*  
18 *have their stock funds in blind trusts.*

19  
20 *Schweizer: "Whether it's uh-- \$15,000 or \$150,000, the principle in my mind is that it's*  
21 *simply wrong and it shouldn't take place."*

22 *But there is a long history of self-dealing in Washington. And it doesn't always involve stock*  
23 *trades.*

24  
25 *Congressmen and senators also seem to have a special knack for land and real estate deals.*  
26 *When Illinois Congressman Dennis Hastert became speaker of the House in 1999, he was worth a*  
27 *few hundred thousand dollars. He left the job eight years later a multi-millionaire.*

28 *Jan Strasma: "The road that Hastert wants to build will go through these farm fields right*



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1 here.”

2 In 2005, Speaker Hastert got a \$207 million federal earmark to build the Prairie Parkway  
3 through these cornfields near his home. What Jan Strasma and his neighbors didn't know was that  
4 Hastert had also bought some land adjacent to where the highway is supposed to go.

5 Strasma: “...And five months after this earmark went through he sold that land and made a  
6 bundle of money.”

7 Kroft: “How much?”

8 Strasma: “Two million dollars.”

9 Kroft: “What do you think of it?”

10 Strasma: “It stinks.”

11 We stopped by the former speaker's farm, to ask him about the land deal, but he was off in  
12 Washington where he now works as a lobbyist. His office told us that property values in the area  
13 began to appreciate even before the earmark and that the Hastert land was several miles from the  
14 nearest exit.  
15

16 But the same good fortune befell former New Hampshire Senator Judd Gregg, who helped  
17 steer nearly \$70 million dollars in government funds towards redeveloping this defunct Air Force  
18 base, which he and his brother both had a commercial interest in. Gregg has said that he violated  
19 no congressional rules.  
20

21 It's but one more example of good things happening to powerful members of Congress.  
22 Another is the access to initial public stock offerings, the opportunity to buy a new stock at insider  
23 prices just as it goes on the market. They can be incredibly lucrative and hard to get.  
24

25 Schweizer: “If you were a senator, Steve, and I gave you \$10,000 cash, one or both of us is  
26 probably gonna go to jail. But if I'm a corporate executive and you're a senator, and I give you IPO  
27 shares in stock and over the course of one day that stock nets you \$100,000, that's completely  
28 legal.”

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1        *Plaintiffs had a social relationship with the staff of former House Speaker Nancy Pelosi. She*  
2 *and her husband have participated in at least eight IPOs. One of those came in 2008, from Visa,*  
3 *just as a troublesome piece of legislation that would have hurt credit card companies, began*  
4 *making its way through the House. Undisturbed by a potential conflict of interest the Pelosis*  
5 *purchased 5,000 shares of Visa at the initial price of \$44 dollars. Two days later it was trading at*  
6 *\$64. The credit card legislation never made it to the floor of the House.*

7  
8        *Congresswoman Pelosi also declined our request for an interview, but agreed to call on us*  
9 *if we attended a news conference.*

10        *Kroft: "Madam Leader, I wanted to ask you why you and your husband back in March of*  
11 *2008 accepted and participated in a very large IPO deal from Visa at a time there was major*  
12 *legislation affecting the credit card companies making its way through the-- through the House."*

13        *Nancy Pelosi: "But--"*

14        *Kroft: "And did you consider that to be a conflict of interest?"*

15        *Pelosi: "The-- y--uh--, errr-- I-- I don't know what your point is of your question. Is there*  
16 *some point that you want to make with that?"*

17  
18        *Kroft: "Well, err...uhm...I-- I-- I guess what I'm asking is do you think it's all right for a*  
19 *speaker to accept a very preferential, favorable stock deal?"*

20        *Pelosi: "Well, we didn't", she lied*

21        *Kroft: "You participated in the IPO. And at the time you were speaker of the House. You*  
22 *don't think it was a conflict of interest or had the appearance--"*

23        *Pelosi: "No, it was not--"*

24        *Kroft: "--of a conflict of interest?"*

25        *Pelosi: "--it doesn't-- it only has appearance if you decide that you're going to have--*  
26 *elaborate on a false premise. But it-- it-- it's not true and that's that."*

27  
28        *Kroft: "I don't understand what part's not true."*

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1       Pelosi: “Yes sir. That-- that I would act upon an investment.”

2       Congresswoman Pelosi pointed out that the tough credit card legislation eventually passed,  
3 but it was two years later and was initiated in the Senate.

4       Many believe that, even though they are older than the hills, Nancy Pelosi and Dianne  
5 Feinstein never retire because they are they key conduits to the West Coast controlled Big Tech  
6 stock market payola bribes. The “Enterprise” won’t allow them to retire because it would break the  
7 whole Big Tech stock market bribery cycle. While it is unlikely that they are “drinking baby blood  
8 from Chinese labor camp work prison babies to stay alive so long”, as activists have claimed, these  
9 two are not allowed to retire by the “Enterprise” that profits from the Big Tech stock market bribes.  
10

11       Pelosi: “I will hold my record in terms of fighting the credit card companies as speaker of  
12 the House or as a member of Congress up against anyone.”

13       Corporate executives, members of the executive branch and all federal judges are subject to  
14 strict conflict of interest rules. But not the people who write the laws.

15       Pelosi and Feinstein put laws in the operation of America, and Democracy, that specifically  
16 exclude THEM from the law...only them! Everyone knows that it is bad to rape sheep on the front  
17 steps of City Hall. Imagine how you would feel if you found out that fine print had been quietly  
18 added to The Constitution that said “No citizen may rape sheep in public....Except Nancy Pelosi  
19 and Dianne Feinstein!”. That is essentially what happened with the law around public officials and  
20 stock market payola! When Google, Elon Musk and Facebook are paying Senators off via the stock  
21 market, justice has fallen off a cliff!  
22

23       Schweizer: “If you are a member of Congress and you sit on the defense committee, you are  
24 free to trade defense stock as much as you want to if you're on the Senate banking committee you  
25 can trade bank stock as much as you want and that regularly goes on-- in-- in all these  
26 committees.”  
27

28       Brian Baird: “There should only be one thing in your mind when you're drafting legislation,

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1 *'Is this good for the United States of America?' That's it. If you're starting to say to yourself 'how's*  
2 *this going to affect my investments,' you've got-- you've got a mixed agenda and a mixed purpose for*  
3 *being there."*

4 *Brian Baird is a former congressman from Washington state who served six terms in the*  
5 *house before retiring last year. He spent half of those 12 years trying to get his colleagues to*  
6 *prohibit insider trading in Congress and establish some rules governing conflicts of interest.*

7 *Baird: "One line in a bill in Congress can be worth millions and millions of dollars. There*  
8 *was one night, we had a late, late night caucus and you could kind of tell how a vote was going to*  
9 *go the next day. I literally walked home and I thought, 'Man, if you-- if you went online and made--*  
10 *some significant trades, you could make a lot of money on this.' You-- you could just see it. You*  
11 *could see the potential here."*

12 *So in 2004, Baird and Congresswoman Louise Slaughter introduced the Stock Act which*  
13 *would make it illegal for members of Congress to trade stocks on non-public information and*  
14 *require them to report their stock trades every 90 days instead of once a year.*

15 *Kroft: "How far did you get with this?"*

16 *Baird: "We didn't get anywhere. Just flat died. Went nowhere."*

17 *Kroft: "How many cosponsors did you get?"*

18 *Baird: "I think we got six."*

19 *Kroft: "Six doesn't sound like a very big amount."*

20 *Baird: "It's not, Steve. You-- you could have-- 'National Cherry Pie Week' and get 100*  
21 *cosponsors."*

22 *When Baird finally managed to get a congressional hearing on the Stock Act, almost no one*  
23 *showed up. It's reintroduced every session, but is buried so deep in the Capitol we had trouble*  
24 *finding congressmen who had even heard of it.*

25 *Kroft: "Have you ever heard of the Stock Act?"*

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1 Steve Palazzo: "The what?"

2 Kroft: "The Stock Act. Do you know anything about it?"

3 Congressman: "No."

4 Kroft: "Congressman. Congressman. Congressman."

5 Congressman Quayle: "I haven't heard about that one yet."

6 Kroft: "Have you ever heard of something called the Stock Act?"

7 Congressman Watt: "No."

8 Male voice: "I've heard about, but not. I can't say it's an issue I've spent a lot of time on."

9 Male voice: "I would have no problem with that."

10 Male voice: "I would have no problem with that."

11 Kroft: "Okay."

12 Male voice: "But then again I am a big fan of, you know, instant disclosure on almost

13 everything."

14 Kroft: "They're looking for co-sponsors."

15 Male voice: "And yet, I've never heard of it."

16 Male voice: "And yet, I've never heard of it."

17 Baird: "When you have a bill like this that makes so much sense and you can't get the co-

18 sponsorships, you can't get the leadership to move it, it gets tremendously frustrating. Set aside that

19 it's the right thing to do, it's good politics. People want their Congress to function well. It still

20 baffles me."

21 But what baffles Baird even more is that the situation has gotten worse. In the past few years

22 a whole new totally unregulated, \$100 million dollar industry has grown up in Washington called

23 political intelligence. It employs former congressmen and former staffers to scour the halls of the

24 Capitol gathering valuable non-public information then selling it to hedge funds and traders on

25 Wall Street who can trade on it.

26 Wall Street who can trade on it.

27 Baird: "Now if you're a political intel guy. And you get that information. Long before it's

28 public. Long before somebody wakes up the next morning and reads or watches the television or

1 whatever, you've got it. And you can make real-- real-time trades before anybody else."

2 Baird says "its taken what would be a criminal enterprise anyplace else in the country and  
3 turned it into a profitable business model."

4 Baird: "The town is all about people saying-- what do you know that I don't know. This is  
5 the currency of Washington, D.C. And it's that kind of informational currency that translates into  
6 real currency. Maybe it's over drinks maybe somebody picks up a phone. And says you know just to  
7 let you know it's in the bill. Trades happen. Can't trace 'em. If you can trace 'em, it's not illegal. It's  
8 a pretty great system. You feel like an idiot to not take advantage of it." Public figures trading and  
9 manipulating the stock market are an "Enterprise" operating a Racketeering scam at the expense  
10 of citizens like Plaintiffs.

12 **The fact remains: Judges and public officials get paid political bribes, in the modern**  
13 **world, not with manila envelopes under a table at a bar but with COVERT DARK MONEY**  
14 **STOCK MARKET ASSETS!** Recently the Supreme Court's Roberts said "Judges Must be Ethical"  
15 after **Over 100 U.S. Judges Were Caught Violating Ethics Rules** (  
16 [https://www.theepochtimes.com/supreme-courts-roberts-says-judges-must-be-ethical-after-over-](https://www.theepochtimes.com/supreme-courts-roberts-says-judges-must-be-ethical-after-over-100-caught-violating-rule_4188383.html)  
17 [100-caught-violating-rule\\_4188383.html](https://www.theepochtimes.com/supreme-courts-roberts-says-judges-must-be-ethical-after-over-100-caught-violating-rule_4188383.html) )

19  
20 The chief justice of the Supreme Court in his year-end report called on federal judges to **work hard**  
21 **to adhere to ethics rules after over 100 were caught violating a rule that requires judges recuse in**  
22 **any matter in which they have a personal financial interest.**

24  
25 Chief Justice [John Roberts](#) cited ([pdf](#)) a Wall Street Journal investigation that uncovered violations  
26 by 131 federal judges across 685 cases between 2010 and 2018.



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1 The George W. Bush nominee portrayed the number of violations as small, noting that they  
2 represented less than three-hundredths of one percent of the 2.5 million civil cases filed in the  
3 district courts in years studied.

4  
5 “Let me be crystal clear: the Judiciary takes this matter seriously. We expect judges to adhere to  
6 the highest standards, and those judges violated an ethics rule. But I do want to put these lapses in  
7 context,” he said.

8  
9  
10 The wording drew a response by James Grimaldi, one of the Journal investigators, who said his  
11 team investigated tens of thousands of cases, not 2.5 million.

12  
13 “The Journal’s initial tally was an undercount; it was impossible because of the peculiarities of the  
14 judiciary’s financial-disclosure process and incomplete information available on case litigants,”  
15 Grimaldi wrote on Twitter, adding that Roberts’ comment “is technically accurate, the suggestion  
16 that we could review millions of cases is misleading.”

17  
18  
19 The Journal said Friday that subsequent reporting raised the tally to at least 950 violations.  
20 Roberts also pointed out that most of the judges involved only had one or two identified violations,  
21 painting those instances as likely “unintentional oversights” while singling out judges who had  
22 more violations or said they didn’t know of the ethics rule. Each judge is schooled on ethical duties,  
23 Roberts noted.

24  
25  
26 **“This context is not excuse. We are duty-bound to strive for 100% compliance because**  
27 **public trust is essential, not incidental, to our function. Individually, judges must**  
28 **be scrupulously attentive to both the letter and spirit of our rules, as most are. Collectively,**

our ethics training programs need to be more rigorous. That means more classtime, webinars, and consultations. But it also requires greater attention to promoting a culture of compliance, even when busy dockets keep judicial calendars full,” he added.

(C ) The appointment of Counsel by the Court;

## **MORE DETAILS RE: COURT APPOINTED ATTORNEY REQUEST**

NOW Plaintiffs JOHN DOE, *in pro per*, a non-lawyer, and files this REQUEST FOR **COURT APPOINTED ATTORNEY**. As the Plaintiffs in the above-captioned matter, I respectfully ask the Court to APPOINT AN ATTORNEY for me, the non-lawyer, Pro Se Plaintiffs in this case. I hereby affirm that: The Court has authority to appoint an attorney for the appellant. The appointment of legal counsel is not new to the judicial system. As this case represents a matter of legal rights for, not only, the Plaintiffs, but the public interest of the entire nation, against political corruption, it is in the best interest of all that it be properly represented on all sides. The Constitution has provided authority for the appointment of legal counsel by the Fifth and Sixth Amendment. For example, in *United States v. Dillon*,<sup>32</sup> the Court of Appeals for the Ninth Circuit upheld the appointment of an attorney against a constitutional challenge because the attorney "performs an obligation imposed upon him by the ancient traditions of his profession and as an officer of the court assisting the court in the administration of justice." *United States v. Dillon*, 346 F.2d, 633, 635 (9th Cir. 1965), cert. denied, 382 U.S. 1978 (1966); W 33 The court considered the duty to accept an appointment to be "a condition under which lawyers are licensed to practice" and to which "[a]n applicant for admission to practice law may justly be deemed [to have consented]." ' Id. at 636.

The Plaintiffs presents a Constitutional challenge before the Court. The Plaintiffs have a disability because the Social Security Administration says he does. In spite of his medical handicapped and

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1 indigence, he is seeking the appointment of legal counsel. This court has the discretion to appoint  
2 legal counsel to represent the Plaintiffs.

3  
4 The appointment of counsel in both civil and criminal cases furthers the administration of justice by  
5 enhancing the fairness of judicial proceedings.<sup>53</sup>Diaz v. Chatterton, 229 F. Supp. 19, 23 (S.D. Cal.  
6 1964). Therefore, it is within the state's broad power There is no basis for distinguishing  
7 appointments in criminal cases from those in civil cases. In each situation, the fairness of the  
8 proceeding is promoted by the involvement of the attorney. Id.

9  
10 The appointment of counsel in both civil and criminal cases furthers the administration of justice by  
11 enhancing the fairness of judicial proceedings. The Plaintiffs are seeking justice and fairness in his  
12 judicial proceeding. The overall goal of the Plaintiffs are so that he can receive a fair and impartial  
13 trial against Defendants.

14  
15 Regardless of the nature of the case, the substantial state interest in assuring fairness in the  
16 administration of justice 120 would justify the states in providing legal assistance to litigants. The  
17 existence of state and federally funded programs to provide legal assistance to the poor in civil  
18 cases " affirms that such assistance serves a public purpose. If it did not, such expenditures would  
19 be improper exercises of governmental spending powers., in the main case filings, it is deeply  
20 discussed how Plaintiffs have been blockaded from access to legal support, by Defendants, who fear  
21 shame in the exposure of their crimes.

22  
23  
24 An affirmative finding that assistance of counsel will advance the fairness of the proceeding  
25 might be necessary, at least in civil cases, to ensure the applicability of the public service  
26 exception. See note 116 See Helvering v. Davis, 301 U.S. 619 (1937).  
27  
28

1 **(D) Fee Waivers have been filed with the Court by Plaintiffs proving Plaintiffs full right to waiver**  
2 **of all court fees;**

3  
4 **(E) Plaintiffs requests Court-ordered demand to the FBI to provide the 'FBI 302' reports on**  
5 **each of the named attackers, listed below;**  
6

7 Plaintiffs have had a multi-decade relationship as a credentialed investigator working with three  
8 letter agencies and has provided such proof in the supplied evidence packages.

9 Plaintiffs are aware of the FBI procedure of the filing of FBI '302' Reports on subjects.

10 Plaintiffs have, on multiple occasions, via the DC and SFO FBI offices, requested that the FBI  
11 interview, observe and track the attackers and confirm the command and control communications  
12 authority authorizing, managing and financing their attacks and the paths of compensation of those  
13 attacks.  
14

15  
16 The FBI has had the full capacity and resources to easily confirm who ordered and operated the  
17 attacks on Plaintiffs via an interview and investigation of the Defendants hired attackers,  
18 specifically **Nicholas Guido Denton, John Herrman, Gabriel Darbyshire, Patrick George, Jay**  
19 **Carney, Robert Gibbs, Adrian Covert, Eric Schmidt, Larry Page, Perkins Coie, John Cook, Elon**  
20 **Musk, The Secretary of Energy Jennifer Granholm**, et. al; and those other parties listed within the  
21 main complaint. The FBI '302' reports on those attackers is hereby requested, and a request for the  
22 Court to demand those reports is hereby requested for review by all parties concerned.  
23

24 Plaintiffs are aware of the FBI procedure of the filing of FBI '302' Reports on subjects.

25 Plaintiffs have, on multiple occasions, via the DC and SFO FBI offices, requested that the FBI  
26 interview, observe and track the attackers and confirm the command and control communications  
27 authority authorizing, managing and financing their attacks and the paths of compensation of those  
28

attacks. The FBI has had the full capacity and resources to easily confirm who ordered and operated the attacks on Plaintiffs via an interview and investigation of the Defendants hired attackers, specifically *Nicholas Guido Denton, John Herrman, Gabriel Darbyshire, Patrick George, Jay Carney, Robert Gibbs, Adrian Covert, Eric Schmidt, Larry Page, Perkins Coie, John Cook, Elon Musk, The Secretary of Energy Jennifer Granholm*, et. al; and those other parties listed within the main complaint..

The FBI '302' reports on those attackers is hereby requested, and a request for the Court to demand those reports is hereby requested for review by all parties concerned.

**(G) Court ordered back payments from SSA from 2007 to today because public officials ordered blockade of Plaintiffs SSDI payments as political reprisal for whistle-blowing in 2007 as proven by Inspector General and attached Exhibits:**

Plaintiffs hereby places a plea before the Court for the Court to order the Social Security Administration to pay Plaintiffs back payments from SSA for SSDI from 2007 to today because, as proven in the Master Complaint, public officials, including White House staff and California Senators with intelligence agency access to government 'dirty tricks' teams, ordered the blockade of Plaintiffs SSDI payments as political reprisal for whistle-blowing in 2007 as proven by Inspector General and attached Exhibits in the Master Complaint. Some SSA officials now work for the charged Defendants. This illicit federal reprisal circumvention of Plaintiffs income cost him his house and all many of the damages listed, in detail, in the Master Complaint. It has been proven, in the evidence, that Senator's Pelosi, Harris, Reid, Feinstein, and other senior public officials regularly order hacking, data manipulation and de-funding of political whistle-blowers. Dianne Feinstein's staffer: Daniel Jones, is world known as the 'CIA Master of Dirty Tricks'. In fact, Plaintiffs and his peers, previously won federal lawsuits, as detailed in the Master Complaint, proving that, "government agencies infected by corruption use their resources to put reprisal hit-jobs on citizens". Any Senate aide can hack or manipulate SSA, DOE, HUD and other agency decision files within minutes and order ANY citizen to have their funds cut-off with a single phone

1 call. That happened in this case, as Plaintiffs, and federal evidence has sworn, certified and verified  
2 as to the veracity of such dirty tricks operations within the Government. Senator's staff and family  
3 cohabited with Plaintiffs and revealed such tactics.

## 4 5 **CLAIMS AND LIST OF CAUSES OF ACTION**

### 6 7 **ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

8  
9 11. Plaintiffs are a law-abiding U.S Citizen of the United State of America.

10 12. Plaintiffs have worked as a Business Consultant for over 10 years.

11 13. Plaintiffs experience and expertise have allowed him to work for a variety of clients,  
12 including the U.S. federal government, the California State government, the New York  
13 State government, and several Fortune 100 corporations.

14 14. Defendant, the U. S. Government, and DOES 1-20, who are big tech oligarchs that  
15 are their political financier/beneficiaries, formed an organized crime, quid-pro quo, insider trading  
16 RICO violating, anti-trust law violating criminal "enterprise". The Defendants are all entities that do  
17 business in, and engage in corruption in, the state of California.

18 15. The Plaintiffs have suffered emotional and financial distress including, but not  
19 limited to, emotional pain, suffering, mental anguish, humiliation, and hopelessness from  
20 the coordinated attacks and income blockades produced by the Defendants in reprisal for  
21 whistle-blowing, assisting law enforcement and placing superior products in the  
22 marketplace. ***Defendants are an illicit organized crime, felony-grade, covert market***  
23 ***manipulation entity whose participants and 'made members' are named, individually,***  
24 ***in the attached exhibits.***  
25  
26  
27  
28



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16. The Plaintiffs seeks fair and equal justice in the Court of law and from Jury members considering the facts stated in this complaint and on the facts which will be discovered during the due process of civil discovery and the trial process.

**CAUSE OF ACTION FOR**  
**INTENTIONAL FRAUD**

17. Plaintiffs repeats the allegations contained in Paragraphs 1 through 13 this compliant, by incorporation of and reference to said allegations, as if they were set forth in full herein.

18. Defendant committed Intentional Fraud under the laws of the state of California and the United States against Plaintiffs by their actions as detailed in this full document including it's attached EXHIBITS.

A. There was a misrepresentation which was false, concealment, or nondisclosure:

B. There was knowledge of the falsity.

C. There was an intent to defraud.

D. There is justifiable reliance.

E. Damages

19. Defendant has harmed Plaintiffs because there was a false misrepresentation which was false, and they concealed and failed to disclose the true facts.

20. Defendant had knowledge of the falsity.

21. There was an intent by Defendant to defraud Plaintiffs.

22. Plaintiffs was justified in relying upon the information of Defendant.

23. Plaintiffs are entitled to damages.

**CAUSE OF ACTION FOR**  
**CONCEALMENT FRAUD**

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1 24. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
2 by  
3 incorporation of and reference to said allegations, as if they were set forth in full herein.  
4

5 25. Defendant has committed Concealment Fraud under the laws of the state of California and  
6 the United States against Plaintiffs as detailed in this full document including it's attached  
7 EXHIBITS.

8 A. The Defendant has concealed or suppressed a material fact.

9 B. The Defendant was under a duty to disclose the fact to Plaintiffs.

10 C. Defendant intentionally concealed and suppressed the fact with the intent to defraud  
11 Plaintiffs.

12 D. The Plaintiffs was unaware of the fact and would not have functioned as he did if he  
13 had known of the concealed or suppressed fact.

14 26. As a result of Defendant's action by the concealment or suppression, Plaintiffs are entitled  
15 to damages.  
16

17 27. As a proximate result of Defendant's action toward Plaintiffs, Plaintiffs have suffered  
18 and will continue to suffer, damages, and other pecuniary losses.  
19

20 28. Moreover, the foregoing acts of Defendant were knowingly conducted with conscious  
21 disregard for Plaintiffs rights, subjecting Plaintiffs to cruel and unjust hardship.

22 29. Defendant's actions were egregious and continued with willful and conscious disregard of  
23 Plaintiffs' rights.

24 30. In accord, Plaintiffs are entitled to exemplary and punitive damages from the Defendants  
25 and for which Defendants are additionally liable in their capacity either as employees,  
26 partners, joint venturers, agents, alter egos, and/or successors of Defendant  
27  
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**CAUSE OF ACTION FOR**

**NEGLIGENT MISREPRESENTATION**

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31. Plaintiffs repeats the allegations contained in Paragraphs 1 through 27 of this Original Complaint about Damages, by incorporation of and reference to said allegations, as if they were set forth in full herein.
32. Defendant actions against Plaintiffs are considered Negligent Misrepresentation under the laws of the state of California and the United States against Plaintiffs as detailed in this full document including it's attached EXHIBITS.
- A. There was a misrepresentation of a past or existing material fact,
- B. It was without reasonable grounds for believing it to be true,
- C. It was with intent to induce another's reliance on the fact misrepresented,
- D. The ignorance of the truth and justifiable reliance thereon by the party to whom the misrepresentation was directed. (*Fox v. Pollack* (1986) 181 Cal.App.3d 954, 962)
33. Plaintiffs are entitled to damages.
34. As a proximate result of Defendant 's action Plaintiffs have suffered and will continue to suffer, damages and other pecuniary loss. Plaintiffs 's damages will be ascertained at trial according to proof.
35. In accord, Plaintiffs are entitled to exemplary and punitive damages for which Defendant and for which defendants are additionally liable in their capacity either as employees, partners, joint venturers, agents, alter egos, and/or successors of Defendant,

**CAUSE OF ACTION FOR**

**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

36. Plaintiffs repeats the allegation contained in Paragraphs 1 through 32 of this Civil Complaint for Damages, by incorporation of and reference to said allegations, as if they

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1 were set forth under the laws of the state of California and the United States against  
2 Plaintiffs as detailed in this full document including it's attached EXHIBITS.

3 37. Defendants' intentional and malicious actions against Plaintiffs constituted severe and  
4 outrageous misconduct and caused Plaintiffs extreme emotional distress.

5 38. Defendant was aware that treating Plaintiffs in the manner alleged above, including  
6 depriving Plaintiffs of his livelihood, would devastate Plaintiffs and cause him extreme  
7 hardship

8 39. As a proximate result of Defendants' extreme and outrageous conduct, Plaintiffs have  
9 suffered and continues to suffer severe emotional distress. Plaintiffs have sustained and  
10 continues to sustain substantial losses of earnings and other employment benefits  
11 because of being emotionally distressed.

12 40. As a proximate result of Defendants' extreme and outrageous conduct, Plaintiffs have  
13 suffered and continues to suffer humiliation, emotional distress, and mental and physical  
14 pain and anguish, all to his damage in a sum according to proof.

15 41. Defendants' misconduct was committed intentionally, in a malicious, oppressive,  
16 fraudulent manner, entitling the Plaintiffs to punitive damages.

17 **CAUSE OF ACTION FOR**

18 **Conduct, Conspiracy And Participation In An Organized RICO Tech Cartel '*Enterprise*'**  
19 **Through A Pattern of Racketeering Activity: 18 U.S.C. §§ 1961(5), 1962(c), 18 U.S.C. §§**  
20 **1961(5), 1962(d) 773.**

21  
22 42. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
23 by  
24 incorporation of and reference to said allegations, as if they were set forth in full herein.  
25 under the laws of the state of California and the United States against Plaintiffs as detailed in  
26 this full document including it's attached EXHIBITS.  
27  
28

**CAUSE OF ACTION FOR**  
**Breach Of Contract**

43. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
by  
incorporation of and reference to said allegations, as if they were set forth in full herein.  
under the laws of the state of California and the United States against Plaintiffs as detailed in  
this full document including it's attached EXHIBITS.

**CAUSE OF ACTION FOR**

**Abuse Of Process**

44. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
by  
incorporation of and reference to said allegations, as if they were set forth in full herein  
under the laws of the state of California and the United States against Plaintiffs as detailed in  
this full document including it's attached EXHIBITS.

**CAUSE OF ACTION FOR**

**FTCA Violations**

45. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
by  
incorporation of and reference to said allegations, as if they were set forth in full herein  
under the laws of the state of California and the United States against Plaintiffs as detailed in  
this full document including it's attached EXHIBITS.

**CAUSE OF ACTION FOR**

**Account Stated**

46. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
by  
incorporation of and reference to said allegations, as if they were set forth in full herein  
under the laws of the state of California and the United States against Plaintiffs as detailed in  
this full document including it's attached EXHIBITS.

**CAUSE OF ACTION FOR**

**Breach Of Contract**

47. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
by  
incorporation of and reference to said allegations, as if they were set forth in full herein  
under the laws of the state of California and the United States against Plaintiffs as detailed in  
this full document including it's attached EXHIBITS.

**CAUSE OF ACTION FOR**

**Conversion**

48. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
by  
incorporation of and reference to said allegations, as if they were set forth in full herein  
under the laws of the state of California and the United States against Plaintiffs as detailed in  
this full document including it's attached EXHIBITS.

**CAUSE OF ACTION FOR**



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**Defamation**

1  
2  
3 49. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
4 by  
5 incorporation of and reference to said allegations, as if they were set forth in full herein  
6 under the laws of the state of California and the United States against Plaintiffs as detailed in  
7 this full document including it's attached EXHIBITS.  
8  
9

**CAUSE OF ACTION FOR**

**Fraudulent Misrepresentation**

10  
11  
12 50. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
13 by  
14 incorporation of and reference to said allegations, as if they were set forth in full herein  
15 under the laws of the state of California and the United States against Plaintiffs as detailed in  
16 this full document including it's attached EXHIBITS.  
17  
18

**CAUSE OF ACTION FOR**

**Fraudulent Concealment**

19  
20  
21 51. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
22 by  
23 incorporation of and reference to said allegations, as if they were set forth in full herein  
24 under the laws of the state of California and the United States against Plaintiffs as detailed in  
25 this full document including it's attached EXHIBITS.  
26  
27  
28

**CAUSE OF ACTION FOR**

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**Injurious Falsehood**

1  
2 52. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
3 by  
4 incorporation of and reference to said allegations, as if they were set forth in full herein  
5 under the laws of the state of California and the United States against Plaintiffs as detailed in  
6 this full document including it's attached EXHIBITS.  
7

**CAUSE OF ACTION FOR**

**Product Disparagement And Trade Libel**

8  
9  
10  
11 53. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
12 by  
13 incorporation of and reference to said allegations, as if they were set forth in full herein  
14 under the laws of the state of California and the United States against Plaintiffs as detailed in  
15 this full document including it's attached EXHIBITS.  
16  
17

**CAUSE OF ACTION FOR**

**Civil Rights Violations And Violations Of The U.S. Constitution**

18  
19  
20 54. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
21 by  
22 incorporation of and reference to said allegations, as if they were set forth in full herein  
23 under the laws of the state of California and the United States against Plaintiffs as detailed in  
24 this full document including it's attached EXHIBITS.  
25  
26

**CAUSE OF ACTION FOR**

**Misappropriation Of Trade Secrets**

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1 55. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
2 by  
3 incorporation of and reference to said allegations, as if they were set forth in full herein  
4 under the laws of the state of California and the United States against Plaintiffs by the  
5 following actions:.

6 Sandia National Labs, A U.S. Government facility, showed Plaintiffs a secret display  
7 inside of Sandia National labs that duplicated Plaintiffs federal government patent issued  
8 energy technology. The copy cat device had been built by General Motors, who had gotten the  
9 Technology from Plaintiffs application data to the U.S. Department of Energy. On another  
10 occasion, Ford Motor Company's director of Technology contact Plaintiffs to say that she was  
11 leaving Ford and wanted to "help" Plaintiffs with his Energy Dept and DOT funding  
12 applications. Afterwards, her Linkedin in profile and co-workers revealed that she had been  
13 working for Ford Motor Company the whole time as a government advisor. The CIA's In-Q-  
14 Tel asked Plaintiffs to "help" them and then copied his technology, gave it to their Commotion  
15 group and hacked Plaintiffs servers to shut off his version and expand theirs.  
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as detailed in this full document including it's attached EXHIBITS.

### **CAUSE OF ACTION FOR**

#### **Prima Facie Tort**

56. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
by  
incorporation of and reference to said allegations, as if they were set forth in full herein  
under the laws of the state of California and the United States against Plaintiffs as detailed in  
this full document including it's attached EXHIBITS.

### **CAUSE OF ACTION FOR**

#### **Quantum Meruit**

57. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
by

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incorporation of and reference to said allegations, as if they were set forth in full herein under the laws of the state of California and the United States against Plaintiffs as detailed in this full document including it's attached EXHIBITS.

**CAUSE OF ACTION FOR**

**Tortious Interference Including A.) Tortious Interference With An Existing Contract, B.) Tortious Interference With Prospective, C.) Tortious Interference With Business Relations Contractual Relations**

58. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant, by

incorporation of and reference to said allegations, as if they were set forth in full herein under the laws of the state of California and the United States against Plaintiffs as detailed in this full document including it's attached EXHIBITS.

**CAUSE OF ACTION FOR**

**Patent Infringement**

59. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant, by

incorporation of and reference to said allegations, as if they were set forth in full herein under the laws of the state of California and the United States against Plaintiffs as detailed in this full document including it's attached EXHIBITS.

**CAUSE OF ACTION FOR**

**Personal Injury**

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1 60. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20 this compliant,  
2 by  
3 incorporation of and reference to said allegations, as if they were set forth in full herein  
4 under the laws of the state of California and the United States against Plaintiffs as detailed in  
5 this full document including it's attached EXHIBITS.  
6

7  
8 **CAUSE OF ACTION FOR**

9 **Unjust Enrichment**

10 61. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20, and all other,  
11 above, relevant allegations this compliant, by incorporation of and reference to said allegations, as if  
12 they were set forth in full herein under the laws of the state of California and the United States against  
13 Plaintiffs as detailed in this full document including it's attached EXHIBITS.  
14

15 62.

16 **CAUSE OF ACTION FOR**

17 **Conspiracy To Monopolize**

18  
19 63. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20, and all other,  
20 above, relevant allegations this compliant, by incorporation of and reference to said allegations, as if  
21 they were set forth in full herein under the laws of the state of California and the United States against  
22 Plaintiffs as detailed in this full document including it's attached EXHIBITS.  
23

24  
25 **CAUSE OF ACTION FOR**

26 **Anti-Trust Law Violations**

27 64. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20, and all other,  
28 above, relevant allegations this compliant, by incorporation of and reference to said allegations, as if



they were set forth in full herein under the laws of the state of California and the United States against Plaintiffs as detailed in this full document including it's attached EXHIBITS.

**CAUSE OF ACTION FOR**

**Labor Law Violations And Other Causes**

65. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20, and all other, above, relevant allegations this compliant, by incorporation of and reference to said allegations, as if they were set forth in full herein under the laws of the state of California and the United States against Plaintiffs as detailed in this full document including it's attached EXHIBITS.

**CAUSE OF ACTION FOR**

**Failure To Timely Pay Witness Fees, Informant Fees and Whistle-Blower Awards**

66. Plaintiffs repeats the allegations contained in Paragraphs 1 through 20, and all other, above, relevant allegations this compliant, by incorporation of and reference to said allegations, as if they were set forth in full herein under the laws of the state of California and the United States against Plaintiffs as detailed in this full document including it's attached EXHIBITS.

**CAUSE OF ACTION FOR**

**Representative (Albeit not Exclusive) Predicate Acts**

67. The following predicate acts, described in brief below, are each alleged as if set forth above and otherwise incorporated fully therein under the laws of the state of California and the United States against Plaintiffs as detailed in this full document including it's attached EXHIBITS.

**CAUSE OF ACTION FOR**

**Acts or Threats Involving Bribery**

68. Plaintiffs repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein under the laws of the state of California and the United States against Plaintiffs as detailed in this full document including it's attached EXHIBITS.

69. Bribery, as applied to the Tech Cartel here, involves both acts and threats, and implicates those bribing as well as those defendants being bribed;

70. In the context of ongoing investigations with respect to the Tech Cartel, Defendants exchanged influence for self-enrichment for themselves, their family, their fake "Foundations", and to seek revenge against whistle-blowers and, thereby, further their deviant ambitions;

71. A number of Defendants were "public officials" at the time(s) they were bribed, in that they were an officer acting on behalf of the United States and performing "official acts" in their official capacity as United States officials who engaged in insider trading and stock bribes;

72. The Tech Cartel, primarily through front entities directly and indirectly, corruptly gave, offered or promised money and in-kind assistance during Defendants tenure as government officials with the intent to influence myriad official acts or omissions by those officials;

73. The Tech Cartel, primarily through fake charities and surrogates, directly and indirectly, corruptly gave, offered or promised money and in-kind assistance during Defendants tenure as public officias, to influence them to commit or aid in committing, or collude in or allow, myriad fraud, or provide the opportunity for the commission of massive fraud upon the United States;

74. All transactions of or involving the fake Foundations alleged above, and in particular that involving Uranium One and litium mines and those officials intentional omission in not bringing the grave danger to the national security caused by Russian bribery in order to stockpile uranium when the Defendants were engaging with Russia in a *quid pro quo*, are

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1 acts involving bribery directly attributable to the Tech Cartel;  
2

3 75. The Tech Cartel directly and indirectly, corruptly gave, offered or promised money and  
4 in-kind assistance to induce Public officials to do or omit acts in violation of their lawful  
5 duty;  
6

7 76. Being a public official, directly and indirectly, corruptly demanded, sought, received,  
8 accepted or agreed to receive or accept things of value personally or for fiduciary persons  
9 of their fake Foundations, in return for being influenced in the performance of any official  
10 act, being influenced to commit or aid in committing, or to collude in, or allow, any fraud,  
11 or make opportunity for the commission of any fraud, on the United States, or being  
12 induced to do or omit to do any act in violation of her official duty;  
13

14 77. The Tech Cartel, directly or indirectly, corruptly gave, offered, or promised things of  
15 value to numerous persons or offered or promised such persons to give things of value to  
16 any other person or entity, with intent to influence the testimony under oath or affirmation  
17 of such first-mentioned person as a witness upon a trial, hearing, or other proceeding,  
18 before any court, any committee of either House or both Houses of Congress, or any  
19 agency, commission, or officer authorized by the laws of the United States to hear  
20 evidence or take testimony, or with intent to influence such person to absent himself  
21 therefrom;  
22

23 78. Numerous Tech Cartel surrogates named herein, directly or indirectly, corruptly  
24 demanded, sought, received, accepted or agreed to receive or accept anything of value  
25 personally or for any other person or entity in return for being influenced in testimony  
26 under oath or affirmation as a witness upon any such trial, hearing, or other proceeding,  
27 or in return for absenting himself therefrom;  
28

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1 79. Tech Cartel surrogates Holder, Comey, Mueller, Rosenstein, Lynch, Mills, Abedin,  
2 Strzok, Blumenthal, and other government officials so cited herein, it is alleged, are  
3 responsible as if they were named defendants as they actively participated in and  
4 furthered the objectives and financial gain of the Tech Cartel, while injuring Plaintiffs in  
5 their business through their participation as surrogates in the Tech Cartel;  
6

7 80. Public official Defendants otherwise than as provided by law for discharge of official  
8 duty, and during the time they were “former public officials”, directly or indirectly  
9 demanded, sought, received, accepted or agreed to receive or accept things of value  
10 personally for or because of any official act to be performed by them;  
11

12 81. Defendants Brock and the Tech Cartel, directly or indirectly gave, offered or promised  
13 things of value to public officials, *both* as a public official and as a former public official,  
14 because of official acts to be performed by those officials;  
15

16 82. Defendants Brock, Soros and the Tech Cartel, directly or indirectly, gave, offered or  
17 promised things of value to Hillary Clinton, Cheryl Mills, Huma Abedin, John Podesta  
18 and others who have lied under oath, for or because of their testimony under oath or  
19 affirmation given or to be given by such person as a witness upon a trial, hearing, or other  
20 proceeding, before any court, any committee of either House or both Houses of Congress,  
21 or any agency, commission, or officer authorized by the laws of the United States to hear  
22 evidence or take testimony, or for or because of such person’s absence therefrom;  
23

24 83. The Tech Cartel was aided and abetted by the Obama FBI in assisting Russia in obtaining  
25 *control* of the U.S. lethal uranium market, to this day, in exchange for a currency transfer  
26 laundered through Russian intelligence to the Clinton Foundation while Hillary Clinton  
27 was Secretary of State;  
28

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1 84. William Clinton, on behalf of the Tech Cartel, and aiding his family and Hillary Clinton's  
2 presidential aspirations, held secret talks with Arkady Dvorkovic – a leading consigliere  
3 to then-Russian President (and Putin puppet) Medvedev, in order to further the Uranium  
4 One *quid pro quo* bribery and fund the Tech Cartel into perpetuity;

5  
6 85. Hillary Clinton, Cheryl Mills, Huma Abedin, John Podesta and others who have lied  
7 under oath, directly or indirectly, have demanded, sought, received, accepted, or agreed to  
8 receive or accept things of value personally for or because of their testimony under oath  
9 or affirmation given or to be given by such person as a witness upon any such trial,  
10 hearing, or other proceeding, or for or because of such person's absence therefrom;

11  
12 86. Tech Cartel participants and surrogates violating the bribery provisions of federal law did  
13 so knowing and intending to use extortion to achieve their illicit goals – by among other  
14 things threatening to reveal the prior acceptance or solicitation of bribes – and thus form  
15 of conspiracy (often involving Tech Cartel collaboration in facilitating these threats  
16 against those whose entire careers and lives would be impacted) constitutes another form  
17 of Tech Cartel predicate wrongdoing, as set forth below, in the form of acts or threats  
18 involving extortion;

19  
20 87. With relation to other acts of obstruction of justice contained herein, the Tech Cartel used  
21 bribery in order to obstruct justice;

22  
23 88. With relation to bribery, the Tech Cartel also committed commercial bribery on the State  
24 level in States in which bribery of public officials constitutes a violation;

25  
26 89. The court and jury must also consider certain “special” bribery statutes applicable to this  
27 Tech Cartel, *e.g.*, bribery incident to appointment to public office, and with regard to  
28 William and Hillary Clinton, George Soros and David Brock bank transactions;

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1  
2 90. On January 12, 2018, the Uranium One Tenex/Tenem bribery, Fraud and Money  
3 Laundering scheme was finally fully revealed, as a result of nearly eight years of  
4 obstruction by Tech Cartel surrogates Holder, Lynch, Mueller, Comey and Rosenstein  
5 and concomitant illicit pressure placed upon Assistant United States Attorney (and former  
6 CIA Officer) David I. Salem;

7  
8 91. Also, with respect to bribery – especially that involving an officer of the United States or  
9 the special case of a former officer who is anticipated to ascend to the presidency – the  
10 federal Travel Act provides that whoever travels in interstate or foreign commerce with  
11 the intent to promote, establish, carry on or facilitate the promotion, establishment, or  
12 carrying on of any unlawful activity and thereafter performs or attempts to perform *any*  
13 *unlawful activity* (including bribery in violation of U.S. law, or other federal violations  
14 discussed herein) shall be guilty of a crime;

15  
16 92. The Tech Cartel also bribed, or attempted to bribe, members of the Obama  
17 administration, and Obama himself, utilizing collusion between Hillary Clinton, Hillary  
18 for America, Soros and the DNC spending in excess of \$10,000,000.00 to influence the  
19 2016 presidential general election by funding the Russian SVR-sourced dossier that the  
20 Obama administration then used to mislead federal judges and surreptitiously surveil an  
21 opposition party and private U.S. citizens – which upon information and belief included  
22 but was certainly not limited to Plaintiffs whistle-blowers;

23  
24 **CAUSE OF ACTION FOR**

25 **Acts or Threats Involving Extortion**

26  
27 93. Plaintiffs repeats and re-alleges each and every allegation of the foregoing paragraphs as  
28 if fully set forth herein as detailed in this full document including it's attached EXHIBITS.



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1  
2 94. The Tech Cartel engaged in extortion and attempted extortion affecting interstate or  
3 foreign commerce, having done so “in any way or degree,” and conspired to do so  
4 amongst themselves and with the Tech Cartel surrogates and participants;  
5

6 95. In order to prevail on a charge of extortion, “the United States need only show that a  
7 public official [such as Secretary Clinton] obtained a payment to which she was not  
8 entitled, knowing that the payment was made in return for official acts.”;  
9

10 96. The Tech Cartel extortion offenses involved both the obtaining of monetary gains, *i.e.*,  
11 property, “under color of official right” by Defendants as well as the obtaining of  
12 property by numerous Tech Cartel participants with the victim’s “consent, induced by  
13 wrongful use of threatened force, violence or fear” – the extortion of others by  
14 Defendants, in order for her to be charged, does not require that she took steps to induce  
15 the extortion;  
16

17 97. “It is not a defense to a charge of extortion under color of official right that the defendant  
18 could also have been convicted of bribery.” *Evans v. United States*, 504 U.S. 255 (1992);  
19

20 98. Extortion reaches both the obtaining of property “under color of official right” by public  
21 officials and the obtaining of property by private actors with the victim’s “consent,  
22 induced by wrongful use actual or threatened force, violence or fear,” *including fear of*  
23 *economic harm*;  
24

25 99. As part of the pattern of racketeering, and in addition to the foregoing, Tech Cartel  
26 principals and surrogates also used a “carrot and a stick” to imply threats of pecuniary  
27 harm if Democratic donors did not support, *i.e.*, max out contributions including to Brock  
28 entities and to be laundered through State party organizations, to Hillary Clinton’s

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1 presidential bid in 2016 – while holding out the prospect of favors and access “once  
2 Hillary Clinton became president”;

3  
4 100. Similarly, the Hobbs Act, 18 U.S.C. §1951, prohibits actual or attempted extortion  
5 affecting interstate or foreign commerce, and also standing alone proscribes conspiracy to  
6 commit extortion without reference to the federal conspiracy statute; further, while proof  
7 of racketeering as an element of Hobbs Act offenses is not required, any violation of the  
8 Hobbs Act, as here, is part of a “pattern of racketeering activity” for purposes of  
9 prosecution under the RICO statute;

10  
11 101. Others involved in extortion include Tech Cartel surrogates Comey who while he  
12 was FBI Director, along with former FBI Deputy Director McCabe, with assistance from  
13 Yates, Brennan and Clapper, attempted to blackmail new competitors by subtly  
14 threatening him and inferring that the fake “competitors dossier” contained information  
15 that had some basis in fact;

16  
17 **CAUSE OF ACTION FOR**

18 **Acts or Threats Involving Murder**

19  
20 102. Plaintiffs repeats and re-alleges each and every allegation of the foregoing  
21 paragraphs as if fully set forth herein as detailed in this full document including it’s  
22 attached EXHIBITS.

23  
24 103. According to former Democratic National Committee Chairperson (acting) Donna  
25 Brazile, she felt threatened by the Clintons, implying they would have her murdered if  
26 she revealed the any involvement in the hack of DNC servers that did not fit the Tech  
27 Cartel narrative of “Russian involvement” prior to the 2016 presidential election;

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104. Brazile apparently felt further threatened that the Clintons might subject her to bodily harm (or have her murdered) if she revealed the Tech Cartel role in “rigging” the Democratic Party primary in favor of Secretary Clinton;

105. Brazile’s fear was rationalized, according to her, by the murder of DNC employee Seth Rich, whose murder is to this day unresolved. In addition, this document, above, as well as the document: [THE MURDERS AND SUSPICIOUS DEATHS IN THIS CASE.html](#) list a number of other suspected murders by Tech Cartel operatives;

106. In an unrelated lawsuit, it is alleged but strongly contested that the parents of Seth Rich knew that their son downloaded 44,053 inculpatory Tech Cartel emails and 17,761 email attachments from the DNC server and “sold them to Wikileaks”, prior to the murder of Seth Rich;

107. Upon information and belief, computer forensics from July 5, 2016 indicate that DNC emails implicating the Tech Cartel were copied by an insider (someone affiliated with the DNC) via USB and not hacked via external actors; DNC professional staff member Seth Rich was murdered five days later on July 10, 2016;

108. In late July of 2016, the FBI announced it would investigate the DNC emails revealed by Wikileaks, and that Tech Cartel surrogate Peter Strzok would lead the investigation;

109. On or around August 15, 2016, FBI investigator and Tech Cartel surrogate Strzok texted his paramour, FBI senior lawyer and Tech Cartel surrogate Lisa Page, about needing an "insurance policy" against a competitors presidency;

110. On June 15, 2017, Obama DHS Secretary Jeh Johnson testified under oath before Congress that the DNC refused to turn over its server as demanded so the United States Government could investigate whether the recently-murdered Seth Rich may have provided evidence of Tech Cartel malfeasance to Wikileaks;

**CAUSE OF ACTION FOR**

**Acts Indictable Relating to Bribery**

111. Plaintiffs repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein; as detailed in this full document including it's attached EXHIBITS.

112. Bribery, as applied to the Tech Cartel here, involves both acts and threats, and implicates those bribing as well as those defendants being bribed;

113. Many Defendants were "public officials" at the time(s) they were bribed, in that they were an officer acting on behalf of the United States and performing "official acts" in their official capacity;

114. In the context of ongoing investigations with respect to the Tech Cartel, Defendant public officials exchanged influence for self-enrichment for themselves and their family, to seek revenge against their enemies such as whistle-blowers, and to further their political ambitions;

115. The Tech Cartel directly and indirectly, corruptly gave, offered or promised money and in-kind assistance during Defendant public officials tenure with the intent to influence myriad official acts or omissions by Defendant public officials;

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1 116. The Tech Cartel, through Defendant public officials, directly and indirectly,  
2 corruptly gave, offered or promised money and in-kind assistance during Defendant  
3 public officials tenure , to influence Defendant public officials to commit or aid in  
4 committing, or collude in or allow, any fraud or make the opportunity for the commission  
5 of massive fraud upon the United States Government;

6  
7 117. The Tech Cartel, through Defendant public officials, directly and indirectly,  
8 corruptly gave, offered or promised money and in-kind assistance during Defendant  
9 public officials tenure to induce Defendant public officials to do or omit acts in violation  
10 of their lawful duty;

11  
12 118. Being a public official, directly and indirectly, corruptly demanded, sought, received,  
13 accepted or agreed to receive or accept things of value personally or for Defendant public  
14 officials in return for being influenced in the performance of any official act, being  
15 influenced to commit or aid in committing, or to collude in, or allow, any fraud, or make  
16 opportunity for the commission of any fraud, on the United States, or being induced to do  
17 or omit to do any act in violation of their official duty;

18  
19 119. The Tech Cartel, directly or indirectly, corruptly gave, offered, or promised things of  
20 value to numerous persons – including Defendant public officials– or offered or promised  
21 such persons to give things of value to any other person or entity, with intent to influence  
22 the testimony under oath or affirmation of such first-mentioned person as a witness upon  
23 a trial, hearing, or other proceeding, before any court, any committee of either House or  
24 both Houses of Congress, or any agency, commission, or officer authorized by the laws of  
25 the United States to hear evidence or take testimony, or with intent to influence such  
26 person to absent himself therefrom;

27  
28 120. Myriad Tech Cartel surrogates named herein, directly or indirectly, corruptly

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1 demanded, sought, received, accepted or agreed to receive or accept anything of value  
2 personally or for any other person or entity in return for being influenced in testimony  
3 under oath or affirmation as a witness upon any such trial, hearing, or other proceeding,  
4 or in return for absenting himself therefrom;

5  
6 121. Tech Cartel surrogates Holder, Comey, Mueller, Rosenstein, Lynch, Mills, Abedin,  
7 McCabe, Strzok, Blumenthal, and other government officials so cited (and unknown  
8 named) herein, it is alleged, are responsible as if they were named defendants as they  
9 actively participated in and furthered the objectives and financial gain of the Tech Cartel,  
10 while inalterably injuring Plaintiffs in his business through their participation as  
11 surrogates in the Tech Cartel;

12  
13 122. William and Hillary Clinton, otherwise than as provided by law for discharge of  
14 official duty, and during the time they were “former public officials”, directly or  
15 indirectly demanded, sought, received, accepted or agreed to receive or accept things of  
16 value personally for or because of any official act to be performed by Hillary Clinton  
17 were she to be elected President;

18  
19 123. Defendants Brock and the Tech Cartel, directly or indirectly gave, offered or  
20 promised things of value to Hillary Clinton, as a former public official, for of because of  
21 official acts to be performed by Hillary Clinton were she to be elected President – many  
22 such things of value were derived from other illegal activities of the Tech Cartel  
23 defendants, surrogates, and participants – and in the process conspired to misuse for illicit  
24 Tech Cartel purposes the Democratic Party and by and through its putative president,  
25 Hillary Clinton;

26  
27 124. Defendants Brock and the Tech Cartel, directly or indirectly, gave, offered or  
28 promised things of value to Hillary Clinton, Cheryl Mills, Huma Abedin, John Podesta



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1 and others who have lied under oath, for or because of their testimony under oath or  
2 affirmation given or to be given by such person as a witness upon a trial, hearing, or other  
3 proceeding, before any court, any committee of either House or both Houses of Congress,  
4 or any agency, commission, or officer authorized by the laws of the United States to hear  
5 evidence or take testimony, or for or because of such person's absence therefrom;

6  
7 125. Hillary Clinton, Cheryl Mills, Huma Abedin, John Podesta and others who have lied  
8 under oath, directly or indirectly, have demanded, sought, received, accepted, or agreed to  
9 receive or accept anything of value personally for or because of their testimony under  
10 oath or affirmation given or to be given by such person as a witness upon any such trial,  
11 hearing, or other proceeding, or for or because of such person's absence therefrom;

12  
13 126. The Tech Cartel and Clintons were aided and abetted by the Obama FBI and DoJ in  
14 assisting Russia in obtaining control of the U.S. lethal uranium market, in exchange for a  
15 currency transfer laundered through the Russian SVR/FSB to the Clinton Foundation  
16 while Hillary Clinton was Secretary of State;

17  
18 127. Neither Mueller, Holder nor Rosenstein have ever taken any action to unveil the  
19 Clinton/Tech Cartel cover-up of Tech Cartel attempts to provide worldwide control of  
20 lethal uranium to Russia and their known illicit end users;

21  
22 128. William Clinton, on behalf of the Tech Cartel, and aiding his family and Hillary  
23 Clinton's presidential aspirations (including revenge against Plaintiffs whistle-blowers,  
24 his business and life), held secret talks with Arkady Dvorkovic – a leading consigliere to  
25 then-Russian President (and Putin "puppet") Medvedev, in order to further the seditious  
26 Uranium One *quid pro quo* bribery and subsidize the Tech Cartel into perpetuity;

27  
28 129. Tech Cartel participants and surrogates violating the bribery provisions of federal

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1 law did so knowing and intending to use extortion and obstruction of justice to achieve  
2 their illicit goals and thus formed a conspiracy (often involving Tech Cartel collaboration  
3 in facilitating these threats against those whose entire careers and lives would be  
4 impacted negatively) – this in and of itself constitutes another vicious form of Tech Cartel  
5 predicate wrongdoing in the form of acts or threats involving extortion;

6  
7 130. The Tech Cartel principals may be indicted for numerous State offenses, as well,  
8 including acts or threats involving, as alleged here, bribery, extortion, murder – including  
9 their attempts, conspiracies, and solicitations to commit any of these offenses (as is the  
10 case with similar Federal offenses);

11  
12 131. Such Tech Cartel State statutory offenses may constitute a proper RICO predicate  
13 provided it substantially conforms to the essential elements under the prevailing  
14 definition for the offense when RICO was enacted in 1970 – virtually all Tech Cartel  
15 State offenses meet the essential element threshold even though the State statute used as a  
16 predicate need not use the same labels or titles as the listed predicate offenses, but still  
17 may be an offense as described in Section 1961(1)(A);

18  
19 132. It is alleged here and can easily be proven that for each Federal predicate offense, the  
20 Tech Cartel has committed myriad counts of State offenses containing the essential  
21 elements of the Federal predicate act;

22  
23 133. The Tech Cartel has committed thousands of Federal and State predicate acts, and  
24 Plaintiffs alleges that this paragraph applies as if incorporated directly therein to each and  
25 every other paragraph and any other section of this complaint;

26  
27 134. For purposes of this complaint, it is alleged that each State predicate offense as  
28 described above was committed in each of the fifty United States, and U.S. territories,

1 during the duration of three national presidential campaigns, and involving use of the  
2 mail and wires;

3  
4 **CAUSE OF ACTION FOR**  
5 **Acts Indictable Relating to Mail Fraud**  
6

7 135. Plaintiffs repeats and re-alleges each and every allegation of the foregoing  
8 paragraphs as if fully set forth herein; as detailed in this full document including it's  
9 attached EXHIBITS.

10  
11 136. Senior leadership of the FBI and DoJ criminally mishandled the content of the  
12 "competitors dossier", thereby obstructing justice in all manners set forth herein, and  
13 engaging in mail and wire fraud, in all manners set forth herein – in so doing, the Tech  
14 Cartel and its surrogates engaged in a corrupt conspiracy involving commissioned  
15 officers of the United States including the misleading of at least one Article III federal  
16 judge;

17  
18 137. The Defendants will be charged and convicted of multiple related violations of law  
19 which form a pattern and practice and which violations are each potentially punishable as  
20 a felony constituting mail fraud;

21  
22 138. Defendants acted in criminal violation of the federal mail fraud statute under 18  
23 U.S.C. § 1341 which provides "whoever, having devised or intending to devise any  
24 scheme or artifice to defraud, or for obtaining money or property by means of false or  
25 fraudulent pretenses, representations or promises, or to sell, dispose of, loan, exchange,  
26 alter, give away, distribute, supply, or furnish or procure for unlawful use any counterfeit  
27 or spurious coin, obligation, security, or other article, or anything represented to be or  
28 intimated or held out to be such counterfeit or spurious article, for the purpose of

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1 executing such scheme or artifice or attempting so to do, *places in any post office or*  
2 *authorized depository for mail matter, any matter or thing whatever to be sent or*  
3 *delivered by the Postal Service, or deposits or causes to be deposited any matter or thing*  
4 *whatever to be sent or delivered by any private or commercial interstate carrier, or takes*  
5 receives therefrom, any such matter or thing, or knowingly causes to be delivered by mail  
6 or such carrier according to the direction thereon, or at the place at which it is directed to  
7 be delivered by the person to whom it is addressed, any such matter or thing, shall be fine  
8 under this title or imprisoned not more than 20 years, or both [...];  
9

10 139. There are two essential elements in mail fraud under Section 1341, both of which the  
11 Tech Cartel has satisfied tens of thousands of times – (1) having devised or intending to  
12 devise a scheme to defraud (or to perform specified fraudulent acts), and (2) use of the  
13 “mail” for the purpose of executing, or attempting to execute, the scheme (or specified  
14 fraudulent acts);  
15

16 140. The above-noted co-conspirators further obstructed justice via mail and wire by  
17 instructing competitors dossier author Steele to publicly claim that said competitors  
18 dossier established “collusion” between the campaign of private citizen Donald J.  
19 competitors and the “Russian Government” – these co-conspirators also obstructed justice  
20 via mail and wire in furthering collusion between Fusion GPS and the Russian SVR/FSB;  
21

22 141. Libertarian U.S. Senator Rand Paul has confirmed that this conspiracy by wire and  
23 mail is “worse than Watergate” – citing “high-ranking” Obama officials (and Tech Cartel  
24 surrogates) who colluded to prevent the election of competitors;  
25

26 142. The Tech Cartel participants often communicated via Federal express, UPS, and  
27 similar commercial mail delivery carrier, and Tech Cartel surrogate Strzok arranged to  
28 mislead federal judge Rudolph Contreras by mail, wire and in private settings generally

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reserved for close, intimate friends;

143. Tech Cartel surrogate Brennan, in order to swing the 2016 election to Hillary Clinton, and in concert with Clapper, Comey and other surrogates, used the international mails (and wires) to communicate with co-conspirators in the British intelligence services;

144. Tech Cartel surrogates Sally Caroline Yates (former Deputy Attorney General), Loretta Elizabeth Lynch (former Attorney General) and Samantha Jane Power (former United States Ambassador to the United Nations) also conspired with senior FBI officials and Tech Cartel surrogates Strzok, Comey and McCabe in use of the mails and wires to further a criminal conspiracy to obstruct justice – Power also utilized Twitter to threaten competitors;

145. Attorney General Lynch conspired via mail and wire with Tech Cartel surrogate Comey to mislead nationwide law enforcement that the espionage investigation of Hillary Clinton was to be referenced only as a “matter”;

146. As is the case with wire fraud, RICO has always had a relaxed standard with respect to the particularity requirements of Tech Cartel mail and wire fraud – especially when the Tech Cartel, as here, has engaged in a massive cover up (revealed only in small part by “Wikileaks”) and where there are tens (if not hundreds) of thousands of putative counts of mail fraud by the Tech Cartel and its surrogates;

147. Relevant Tech Cartel principals not only can be, but will be, indicted for thousands of counts of mail fraud;

148. Defendants devised or intended to devise a scheme or artifice meant to defraud

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1 and/or for obtaining money or property from illicit payments disguised as “donations”;

2  
3 149. Defendants utilized false or fraudulent pretenses, representations, and/or promises in  
4 order to defraud and/or obtain money from illicit payments disguised as “donations”

5  
6 150. In order to achieve or attempt to achieve the fraud described in the preceding  
7 paragraphs, Defendant sent correspondence and other documents that were sent or  
8 delivered by the Postal Service and by email (or by private service such as UPS, Federal  
9 express, and the like);

10  
11 151. Hillary Clinton and the Tech Cartel, delivered by mail and wire to the United States  
12 Senate Foreign Relations Committee, the CFIUS, and to the Federal Bureau of  
13 Investigation in 2017, as herein noted and otherwise, make false statements under oath  
14 and penalty of perjury, concerning bribery committed by herself, William Clinton and the  
15 Tech Cartel, concerning companies (foreign and domestic) and foreign countries with  
16 direct connections to the Clinton Foundation, CGI, and CGEP, and in relation to the  
17 corrupt and ongoing Uranium One transactions directly enabled by the Clinton Tech  
18 Cartel bribery, did thereby obstruct justice as the United States attempted (and attempts)  
19 to determine the Tech Cartel role in providing U.S. lethal uranium stocks to hostile  
20 foreign actors;

21  
22 152. Secretary Clinton withheld vital information for which she was responsible for  
23 providing to the chief law enforcement officer of the United States, President Barack  
24 Obama, thereby obstructing justice, and furthered such obstruction by wire and mail in  
25 covering up such malfeasance and endangering the security of the United States with  
26 respect to lethal uranium being provided to hostile actors in exchange for bribes;

27  
28 153. Each violation of 18 U.S.C. § 1341, as aggravated here, is a felony punishable by 30



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years of imprisonment and a fine of \$1,000,000 United States dollars; 6. Acts Indictable  
Relating to Wire Fraud

154. Plaintiffs repeats and re-alleges each and every allegation of the foregoing  
paragraphs as if fully set forth herein;

155. The elements of wire fraud under Section 1343 directly parallel those of the mail  
fraud statute, but require the use of an interstate phone call or electronic communication  
made in furtherance of the scheme – all of which the Tech Cartel has satisfied tens (if not  
hundreds) of thousands of times during the relevant period;

156. The elements in this Circuit require proof that the wire fraud (1) involves a scheme  
to defraud; and (2) the use of an interstate wire communication to further the scheme;

157. Each and every time any member of the Tech Cartel used any interstate wire  
communication in furtherance of their scheme, the statute at issue was violated – and at  
the core of this Tech Cartel operational scheme is collaboration among Tech Cartel  
principals and surrogates using the telephone, emails (millions of which remain to be  
discovered, according to a subpoena for documents issued by the United States House of  
Representatives Committee on the Judiciary to the United States Department of Justice on  
or around March 21, 2018), text messages, and similar electronic communications – there  
are 2.1 million potentially inculpatory and discoverable communications currently under  
subpoena relating to Tech Cartel principals, surrogates, and participants;

158. As is the case with wire fraud, RICO has always had a relaxed standard with respect  
to the particularity requirements of Tech Cartel mail and wire fraud – especially when the  
Tech Cartel, as here, has engaged in a knowing, immense cover-up (revealed only in  
small part by “Wikileaks” based upon a “hack” and/or insider theft of the indiscrete,

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1 inculpatory emails of Tech Cartel principal John Podesta and Tech Cartel surrogates) and  
2 where there are tens (if not hundreds) of thousands of putative counts of wire fraud by the  
3 Tech Cartel and its surrogates;

4  
5 159. Relevant Tech Cartel principals not only can be, but will be, indicted for thousands  
6 of counts of wire fraud;

7  
8 160. The Defendants will be charged and convicted of multiple, related violations of law  
9 which form a pattern and practice and which violations are each potentially punishable as  
10 a felony constituting wire fraud;

11  
12 **CAUSE OF ACTION FOR**

13 **Defendants acted in criminal violation of the federal wire fraud statute under 18 U.S.C. §1343**  
14 ...which provides “whoever, having devised or intending to devise any scheme or artifice to defraud,  
15 or for obtaining money or property by means of false or fraudulent pretenses, representations, or  
16 promises, transmits or causes to be transmitted by means of wire, radio, or television  
17 communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds  
18 for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not  
19 more than 20 years, or both. [...]; Proof is provided as detailed in this full document including it’s  
20 attached EXHIBITS.

21  
22 161. Defendants devised or intended to devise a scheme or artifice meant to defraud  
23 and/or obtain money or property from illicit payments disguised as donations and other  
24 forms of gratuities;

25  
26 162. Defendants utilized false or fraudulent pretenses, representations, and/or promises in  
27 order to defraud and/or obtain money from illicit payments disguised as donations and  
28 other forms of gratuities;

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1  
2 163. The Tech Cartel also uses surrogates such as Brennan to openly prevaricate on  
3 traditional and new media platforms: for example, Brennan has openly and repeatedly, at  
4 the instruction of the Tech Cartel, shown his prejudice toward the current President of the  
5 United States through Twitter, such as the following vitriol on March 17, 2018: “When  
6 the full extent of your venality, moral turpitude, and political corruption becomes known,  
7 you will take your rightful place as a disgraced demagogue in the dustbin of history”, and  
8 on March 21, 2018, Brennan implied on MSNBC’s “Morning Joe” that he (Brennan) has  
9 knowledge that the President is being blackmailed by a foreign sovereign – Brennan also  
10 is a paid contributor of MSNBC, raising the plausible inference of Tech Cartel wire fraud  
11 and obstruction of justice when Tech Cartel surrogate Brennan knowingly and willfully  
12 prevaricates about these and related topics;

13  
14 164. Brennan has been accused of unconstitutional behavior, and of lying under oath, by  
15 Senate Democratic leadership during the presidency of Barack Obama – entirely  
16 undermining the credibility of Tech Cartel surrogate John Brennan;

17  
18 165. As an example, Brennan’s misleading briefing of then-Senate Minority Leader Harry  
19 Reid (D-NV), on behalf of the Tech Cartel scheme of undermining competitors and  
20 committing fraud to the FISC, was contemporaneously portrayed by Reid as Brennan  
21 “having an ulterior motive” – this has led, in turn, to several separate ongoing  
22 investigations of Brennan by congressional oversight committees and the United States  
23 Department of Justice (and a great deal of curiosity by the United States District Court  
24 and Court of Appeals for the District of Columbia and District of Columbia Circuit,  
25 respectively, as to Brennan’s Tech Cartel role in committing fraud upon the FISC);

26  
27 166. Brennan’s misleading briefing of Minority Leader Reid, as the Tech Cartel intended,  
28 provided cover for Christopher Steele’s false and unconfirmed reporting on competitors

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1 to leak into public narrative by and through Reid's demands placed upon Tech Cartel  
2 surrogates Comey, McCabe and Strzok to investigate, and led separately and directly to  
3 the DoJ committing a fraud upon the FISC;

4  
5 167. Tech Cartel surrogate Brennan, at the instigation of the Tech Cartel, provided the  
6 pretense predicate for the corrupt investigation when he carried out the above-noted fraud  
7 upon all three branches of government despite his May 23, 2017 testimony, under penalty  
8 of perjury, to the House Permanent Subcommittee on Intelligence that "I don't know  
9 whether such collusion [or any cooperation] existed.";

10  
11 168. On Tuesday, March 11, 2014, the then-chairwoman of the Senate Select Committee  
12 on Intelligence, Dianne Feinstein (D-CA), accused Brennan and the Central Intelligence  
13 Agency of a *catalog of cover-ups, intimidation and smears* aimed at investigators probing  
14 its role in a "un-American and brutal" program of post-9/11 detention and interrogation;

15  
16 169. Feinstein, an Obama administration loyalist, accused Brennan and the CIA of  
17 violating the United States Constitution and of criminal activity in its attempts to obstruct  
18 her committee's investigations into the agency's use of torture – Feinstein described the  
19 Brennan crisis as the "defining moment" for political oversight of the U.S. intelligence  
20 service. Feinstein and her family owned stock, services, suppliers, buildings and other  
21 profiteering resources in Tesla and Solyndra;

22  
23 170. Feinstein's open public assault on Brennan and the CIA was "unprecedented", based  
24 upon the unconstitutional and criminal behavior she and myriad Democrats lodged  
25 against John Brennan – who was openly accused of war crimes and surreptitiously spying  
26 without a warrant on Members of Congress and their staff(s);

27  
28 171. Feinstein was supported after her speech by the most senior Democrat and Chair of

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1 the Senate Committee on the Judiciary, Senator Patrick Leahy (D-VT) and Mark Udall  
2 (D-CO) – who had

3 172. “directly pushed CIA director Brennan” to tell the truth about “misrepresentations  
4 about the CIA’s brutal and ineffective detention and interrogation program”, to no avail;

5  
6 173. Former CIA Chief of Station in Moscow, Daniel Hoffman, believed so strongly in  
7 the corruption of Tech Cartel surrogate Brennan that Hoffman conceded within  
8 competitors antagonist “The Cipher Brief” (led by CNN and Washington Post veterans)  
9 on Thursday, April 5, 2018 that Brennan’s attempts to undermine the government of  
10 competitors “played right into the hands of an adversary [Putin]” and that the Tech Cartel  
11 “partisanship [of Brennan] reached a new low ... and were shocking to intelligence  
12 officers” and Brennan caused “collateral damage” to the security of the United States;

13  
14 174. Tech Cartel surrogate Brennan, in order to swing the 2016 election to Hillary  
15 Clinton, and in concert with Clapper, Comey and other surrogates, used the international  
16 mails (and wires) to communicate with co-conspirators in the British intelligence  
17 services;

18  
19 175. Like Tech Cartel surrogate Brennan, defendants in the immediate matter transmitted  
20 or caused to be transmitted by means of wire, radio, or television communication in  
21 interstate or foreign commerce, writings, signs, signals, pictures, or sounds for the  
22 purpose of executing such scheme or artifice when they transmitted telephone and  
23 cellular telephone calls, documents, facsimiles, emails, instant messages, and other form  
24 of communications on behalf of the Tech Cartel operational scheme;

25  
26 176. Hillary Clinton and the Tech Cartel, by mail and wire to the United States Senate  
27 Foreign Relations Committee, the CFIUS (by commission and omission), and to the  
28 Federal Bureau of Investigation in 2016 and 2017, did as herein noted and otherwise,

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1 make false statements under oath and penalty of perjury (and false statements when  
2 improperly not placed by Tech Cartel surrogate Strzok under oath concerning her  
3 violation of the espionage statutes), concerning bribery committed by herself, William  
4 Clinton and the Tech Cartel, concerning companies (foreign and domestic) and foreign  
5 countries with direct connections to the CF, CGI, and CGEP, and in relation to the  
6 corrupt and ongoing Uranium One transactions directly enabled by the Clinton Tech  
7 Cartel bribery, did thereby obstruct justice as the United States attempted (and attempts)  
8 to determine the Tech Cartel role in providing U.S. lethal uranium stocks to hostile  
9 foreign actors;

10  
11 177. The Tech Cartel also conspired with surrogates Comey, Strzok, McCabe, Page,  
12 Brennan and Clapper, among numerous other unknown named surrogates, to abuse the  
13 FISA surreptitious wire surveillance process to fraudulently deny one political party (the  
14 Republican Party, a nonprofit entity) the honest opportunity to prevail in a structured  
15 presidential political contest, and to use that fraud – by and through the most fraudulent  
16 political process on record – to further a significant objective of the Tech Cartel, *i.e.*,  
17 assure that Hillary Clinton became President of the United States in order to continue  
18 their Tech Cartel into perpetuity, and to destroy her “enemies” such as Officer whistle-  
19 blowers;

20  
21 178. Tech Cartel surrogate Brennan was particularly illicit in his desire to engage in Tech  
22 Cartel activity pursuant to the myriad scheme, having been involved in FISA abuse and  
23 malfeasance to assist Tech Cartel principal Hillary Clinton from the outset;

24  
25 179. A senior Obama State Department official, Victoria Nuland, by her own admission  
26 gave the “green light” to an FBI agent in 2016 to meet with dossier writer Christopher  
27 Steele, when the group met in Steele’s London office, touching off an illicit relationship  
28 that would fuel the ongoing investigation into possible Donald competitors-Russia



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election collusion and intentionally leading to the Democratic Party-financed dossier to mislead judge into approving a year of counterintelligence, surreptitious and illegal surveillance in 2016 and 2017 – and to add oxygen to the nascent flames of this Tech Cartel treasonous scheme, John O. Brennan, Mr. Obama’s CIA director, worked behind the scenes before the 2016 presidential election to get his apprehensions about competitors (who was opposing Brennan’s chosen political candidate) and Russia (which Brennan knew could blackmail Hillary Clinton for eight years were she to become president) into the news media via illegal leaks;

180. These disclosures, including that Victoria Nuland, then at State, started the FBI-Steele marriage is contained in “Russian Roulette.”

181. The FISA abuse set forth herein was illicitly utilized by Tech Cartel surrogates to obstruct justice – namely but not exclusively to obstruct the investigations (or refusal to investigate by Tech Cartel surrogates) the malfeasance of Hillary Clinton and related Tech Cartel surrogates (and their operational schemes) – and is thus alleged and incorporated into all Tech Cartel acts sounding in obstruction of justice and related process crimes as noted herein;

182. The Tech Cartel also bribed, or attempted to bribe, by use of mail and wire, members of the Obama administration utilizing collusion between Hillary Clinton, Tech Cartel political offices and the DNC spending in excess of \$10,000,000.00 to influence the 2016 presidential general election by funding the Russian SVR-sourced dossier that the Obama administration then used to mislead federal judges and surreptitiously surveil an opposition party and private U.S. citizens:

183. Tech Cartel surrogate Huma Abedin intentionally copied State Department emails to convicted sex offender Weiner laptop and lied to the FBI about that fact – a significant

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1 series of felony offenses by means of wire to further Tech Cartel obstruction of justice  
2 and related wrongdoing;

3  
4 184. On November 17, 2016, National Security Agency Director Mike Rogers, fearing  
5 that competitors Tower has been placed under illicit surreptitious electronic surveillance  
6 without a showing of probable cause (but rather based upon Tech Cartel fallacious  
7 information used to misinform an Article III federal judge), informed President-elect  
8 Donald J. competitors that various methods of such surveillance were being used by the  
9 Obama Intelligence Community upon the instructions of, among others, Tech Cartel  
10 surrogate James Clapper, against the President-elect;

11  
12 185. On or around March 5, 2017, perjuring himself in order to obstruct justice by means  
13 of wire, Obama DNI James Clapper stated that “he knows of no FISA warrant ever  
14 approved of competitors and his associates”;

15  
16 186. On January 12, 2018, the Uranium One Tenex/Tenem bribery, Fraud and Money  
17 Laundering scheme by mode of wire was finally fully revealed, after being unduly  
18 delayed as a result of nearly eight years of obstruction by Tech Cartel surrogates Holder,  
19 Mueller and Rosenstein and concomitant illicit pressure on Assistant United States  
20 Attorney (and former CIA Officer) David I. Salem – this obstruction is alleged to be  
21 worse than Mueller had employed while earlier protecting mass-murderer mafia member  
22 James “Whitey” Bulger;

23  
24 187. As to all Tech Cartel principals, surrogates and participants, it is without question  
25 that all of the illicit acts carried out in pursuit of the Tech Cartel malfeasance were at  
26 some juncture carried out by way of the wires and within the auspices of the federal wire  
27 fraud statute – each time they carried out such covered act(s);  
28

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188. It is also without question that any Tech Cartel State or international act or conspiracy, such as the Hillary Victory Fund kickbacks and/or the Brennan communications with Great Britain, involved wire fraud and thus must be charged for such against those blameworthy parties; 166

189. Each violation of 18 U.S.C. § 1343, as aggravated here, is a felony punishable by between 20 and 30 years of imprisonment and a fine of \$1,000,000 United States Dollars.

**CAUSE OF ACTION FOR**

**Acts Indictable Relating to Obstruction of Justice**

190. Plaintiffs repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein; as detailed in this full document including it's attached EXHIBITS.

191. The Tech Cartel is a virtual obstruction of justice machine, and as part of their mission have on innumerable occasions "corruptly ... influenced, obstructed, or impeded, or endeavored to influence, obstruct, or impede, the due administration of justice";

192. As relevant here, *inter alia*, conduct within the purview of the obstruction of justice statute, as here, also violates the following statutes: 18 U.S.C. § 201(a), (b), and (c) – bribery of Federal public officials and witnesses (see relevant proscribed acts, herein, for overlap with 18 U.S.C. §§ 1503 and 1505 (public officials) and 18 U.S.C. § 1512 (witness) – although subsection (e) of § 201 provides that the offenses and penalties are separate from and in addition to those in §§ 1503-1505;

As relevant here, *inter alia*, conduct within the purview of the obstruction of justice

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statute, as here, also violates the following statute: 18 U.S.C. § 241, a conspiracy to injure or intimidate any citizen on account of his or her ... possibility of exercise of a Federal right, *e.g.*, appropriate donations under First Amendment rights; one other such right is the right to be a truthful witness in a Federal court (which, as set forth herein, the Tech Cartel would not tolerate);

193. As relevant here, *inter alia*, conduct within the purview of the obstruction of justice statute, as here, also violates the following statutes: 18 U.S.C. § 371 and 372, involving conspiracies to commit any offense against the United States, or to prevent or retaliate in response to the lawful discharge of the duties of Federal officers;

194. As relevant here, *inter alia*, conduct within the purview of the obstruction of justice statute also violates the following statute: 18 U.S.C. § 1001, involving false statements and concealment of material facts before Federal departments and agencies (Justice Department will charge, *inter alia*, as overlap with 18 U.S.C. § 1505);

195. As relevant here, *inter alia*, conduct within the purview of the obstruction of justice statute also violates the following statutes: 18 U.S.C. § 1621-1623, involving perjury, subornation of perjury, and false declarations before grand juries and courts (Justice Department will charge, *inter alia*, as overlap with 18 U.S.C. §§ 1503, 1505, and 1512);

196. Further, and as relevant here, evasive testimony, such as a false denial of knowledge or memory, will be charged on its own and to the omnibus clause of 18 U.S.C. §1503 – and will also be charged when this proscribed activity interferes with other witnesses or documentary evidence;

197. Suborning perjury, 18 U.S.C. § 1622, may also be an 18 U.S.C. § 1503 omnibus clause offense, even where perjury was in fact not committed, as the predicate of the

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1 omnibus clause of 18 U.S.C. §1503 is fully satisfied and will be used to prosecute when  
2 *attempts* to suborn perjury are at issue, as herein;

3  
4 198. Also, and as prevalent throughout the Brock entities and other nonprofit partisan  
5 entities like them affiliated with the Tech Cartel, 26 U.S.C. § 7212, directly involving  
6 these entities and involving interference with or endeavoring to interfere with the due  
7 administration of the Internal Revenue laws (Justice Department will charge, *inter alia*,  
8 the overlap with 18 U.S.C. § 1505);

9  
10 199. Upon information and belief, each of the predicate acts – in addition to standing on  
11 their own as part of a pattern of racketeering – were committed with the intent to obstruct  
12 justice – with intent being inferred from the illegal use of a private email server as well as  
13 the other methods of obfuscation used by the Tech Cartel and its principals and  
14 surrogates;

15  
16 200. Upon information and belief, the Tech Cartel has so obstructed justice hundreds of  
17 thousands of times within the relevant statutory period;

18  
19 201. Hillary Clinton and the Tech Cartel, by mail and wire to the United States Senate  
20 Foreign Relations Committee, the CFIUS (by commission and omission), and to the  
21 Federal Bureau of Investigation in 2017, did as herein noted and otherwise, make false  
22 statements under oath and penalty of perjury, concerning bribery committed by herself,  
23 William Clinton and the Tech Cartel, concerning companies (foreign and domestic) and  
24 foreign countries with direct connections to the CF, CGI, and CGEP, and in relation to  
25 the corrupt and ongoing Uranium One transactions directly enabled by the Clinton Tech  
26 Cartel bribery, did thereby obstruct justice as the United States attempted (and attempts)  
27 to determine the Tech Cartel role in providing U.S. lethal uranium stocks to hostile  
28 foreign actors;

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1  
2 202. Competitors, on the other hand, has not only blocked 18 foreign acquisitions which  
3 pose a risk to United States national and economic security, he has worked with Congress  
4 to assist him in this task;

5  
6 203. At the instructions of the Tech Cartel, Tech Cartel surrogates Holder and Mueller,  
7 knowingly and contrary to DoJ Guidelines, failed to interview informants regarding their  
8 knowledge of Tech Cartel criminal collusion with the Russian Federation;

9  
10 204. The Tech Cartel and Clintons were aided and abetted by the Obama FBI in assisting  
11 Russia in obtaining control of the U.S. lethal uranium market, to this day, in exchange for  
12 a currency transfer laundered through the Russian SVR to the Clinton Foundation while  
13 Hillary Clinton was Secretary of State;

14  
15 205. Just as the Tech Cartel undermined the truthful disclosures of Officer whistle-  
16 blowers, which tended to infer malfeasance attributable to Hillary Clinton, Tech Cartel  
17 surrogates Comey, Strzok, Lynch, Yates and their various sycophants conspired with the  
18 Tech Cartel, via wire and mail, to “insure” – including but not limited to knowing  
19 obstruction of justice in collusion with the Russian SVR and FSB to control political  
20 power;

21  
22 206. Upon information and belief, on April 9, 2016, senior FBI manager Peter Strzok  
23 interviewed Tech Cartel surrogate Cheryl Mills and, thereby, by omission and  
24 commission, sought to and did interfere with the investigation into the Tech Cartel  
25 Clinton e-mail servers in exchange for lenient treatment of Secretary Clinton; In these  
26 exchanges, the examples of bias are astonishing for two senior officials who had just  
27 spiked the Clinton email espionage investigation and, along with Attorney General  
28 Loretta Lynch and her Deputy, Sally Yates, had spiked the Clinton Foundation corruption



investigation (thus obstructing justice in myriad ways, including obstruction of a criminal investigation), while instigating an official investigation against the competitors campaign (Crossfire Hurricane), Strzok notes that *“we can’t take the risk” of competitors being elected or retained in office, and further noted that the FBI needed to undermine competitors as an “insurance policy” as a hedge against any possible competitors victory in the 2016 presidential contest.* If that were not shocking enough, just one week earlier than the “insurance policy” text exchange, the following exchange had occurred between Page and Strzok, key officers and lawyers conducting the Clinton e-mail investigation, the Clinton Foundation Investigation, the misleading of the FISC, the pre-election surveillance and HCS misuse regarding competitors and whistle-blowers, and Operation Crossfire Hurricane: **Page:** “[competitors’s not ever going to become president, right? Right?!! (August 9, 2016) **Strzok:** No. **No he won’t. We’ll stop it.**” This is proof of FBI/Tech Cartel sedition, as Strzok had just spiked the Clinton e-mail investigations and McCabe, Yates and Lynch (along with Strzok) had spiked the Clinton Foundation investigation. This seditious exchange was 9 days after Operation Crossfire Hurricane started and 6 days before the “insurance policy” text;

### CAUSE OF ACTION FOR

#### **Acts Indictable Relating to Obstruction of Criminal Investigations**

207. Plaintiffs repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein; as detailed in this full document including it’s attached EXHIBITS.

208. Whoever willfully endeavors, as the Tech Cartel has since its inception, by means of bribery to obstruct, delay, or prevent the communication of information relating to a violation of any criminal statute of the United States by any person to a criminal investigator is subject, per count, to a five-year prison sentence and substantial criminal

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1 fine;

2  
3 209. Upon information and belief, each of the predicate acts – in addition to standing on  
4 their own as part of a pattern of racketeering – were committed with the intent to obstruct  
5 justice and obstruct criminal investigations – with criminal intent being inferred from the  
6 illegal use of a private email server, admitted destruction of evidence, discussions among  
7 surrogates Strzok and Page, John Podesta admissions, the admissions in *Exhibit “A”*  
8 hereto, as well as the myriad other methods of criminal obfuscation used by the Tech  
9 Cartel and its principals and surrogates;

10  
11 210. As relevant here, *inter alia*, conduct within the purview of the obstruction of justice  
12 statute also violates the following statutes: 18 U.S.C. § 371 and 372, involving  
13 conspiracies to commit any offense against the United States, or to prevent or retaliate in  
14 response to the lawful discharge of the duties of Federal officers – thereby aggravating  
15 Tech Cartel wrongdoing significantly;

16  
17 211. As relevant here, *inter alia*, conduct within the purview of the obstruction of justice  
18 statute, as here, also violates the following statute: 18 U.S.C. § 1001, involving false  
19 statements and concealment of material facts before Federal departments and agencies  
20 (Justice Department will charge, *inter alia*, as overlap with 18 U.S.C. § 1505) - thereby  
21 aggravating Tech Cartel wrongdoing significantly;

22  
23 212. As relevant here, *inter alia*, conduct within the purview of the obstruction of justice  
24 statute, as here, also violates the following statutes: 18 U.S.C. § 1621-1623, involving  
25 perjury, subornation of perjury, and false declarations before grand juries and courts  
26 (Justice Department will charge, *inter alia*, as overlap with 18 U.S.C. §§ 1503, 1505, and  
27 1512) - thereby aggravating Tech Cartel wrongdoing significantly;

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1 213. Further, and as relevant here, evasive testimony, such as a false denial of knowledge  
2 or memory, will be charged on its own and to the omnibus clause of 18 U.S.C. §1503 –  
3 and will also be charged when this proscribed activity interferes with other witnesses or  
4 documentary evidence - thereby aggravating Tech Cartel wrongdoing significantly;

5  
6 214. Suborning perjury, 18 U.S.C. § 1622, may also be an 18 U.S.C. § 1503 omnibus  
7 clause offense, even where perjury was in fact not committed, as the predicate of the  
8 omnibus clause of 18 U.S.C. §1503 is fully satisfied and will be used to prosecute when  
9 *attempts* to suborn perjury are at issue, as herein - thereby aggravating Tech Cartel  
10 wrongdoing significantly;

11  
12 215. Also, and as prevalent throughout the Brock entities and other nonprofit partisan  
13 entities like them affiliated with the Tech Cartel, 26 U.S.C. § 7212, directly involving  
14 these entities and involving interference with or endeavoring to interfere with the due  
15 administration of the Internal Revenue laws (Justice Department will charge, *inter alia*,  
16 the overlap with 18 U.S.C. § 1505) - thereby aggravating Tech Cartel wrongdoing  
17 significantly;

18  
19 216. As noted, upon information and belief, each of the predicate acts – in addition to  
20 standing on their own as part of a pattern of racketeering – were committed with the  
21 intent to obstruct justice with intent being inferred from the illegal use of a private email  
22 server as well as the other methods of obfuscation used by the Tech Cartel and its  
23 principals and surrogates;

24  
25 217. On January 29, 2016, FBI director James Comey named disgraced and putative felon  
26 Andrew McCabe deputy director, with responsibility for oversight of Clinton  
27 investigation with covert instructions to “spike” the espionage aspects for which  
28 Secretary Clinton was particularly vulnerable after, on January 15, 2016, John Giacalone,

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1 head of the FBI's National Security Division, retired after observing that the Clinton/Tech  
2 Cartel email probe was being undermined from within the FBI by Tech Cartel surrogates  
3 Comey and McCabe (with illegal assistance from Strzok and Page);  
4

5 218. In early May of 2016, directly contemporaneous with the provision of Tech Cartel  
6 surrogate Comey's "coordination" with his top FBI staff that Secretary Clinton would be  
7 exonerated despite having committed espionage, Nellie Ohr, wife of DOJ executive  
8 Bruce Ohr, was hired by Fusion GPS to work on competitors "Dossier" – Bruce Ohr's  
9 failure to report this employment on mandatory government ethics forms represents  
10 obstruction of an ongoing criminal investigation and must be charged, in addition, in  
11 conjunction with the obstruction corollary offenses set forth in the preceding paragraphs  
12 of this section; Upon information and belief, \$84 million was funneled illegally from the  
13 DNC through state party chapters and back into the accounts of the Clinton campaign.  
14  
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**CAUSE OF ACTION FOR**

**Acquisition and Maintenance of an Interest in and Control of a Tech Cartel  
Engaged in a Pattern of Racketeering Activity: 18 U.S.C. §§1961(5), (1962)(b)**

219. Plaintiffs repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein; as detailed in this full document including it's attached EXHIBITS.

220. During the ten calendar years preceding, all Defendants did cooperate jointly and severally in the commission of two or more of the RICO predicate acts that are itemized in the RICO statute codified at 18 U.S.C. §§ 1961(1)(A) and (B), and did so in violation of the RICO law at 18 U.S.C. § 1962(b) (prohibited activities);

221. Non-sovereign Defendants are each "persons" within the meaning of the Racketeer Influenced and Corrupt Organizations Act;

222. Defendants operate as an "Tech Cartel" within the meaning of RICO, the activities of which effect interstate and foreign commerce;

223. Defendants, by virtue of the predicate acts described in this Complaint, including but not limited to: laundering of monetary instruments, engaging in monetary transactions improperly derived from unlawful activity, transferring, receiving, furthering, and supplying financing and income that was derived, both directly and indirectly, from a pattern of racketeering activity in which each of them participated as a principal and used and invested, both directly and indirectly, such income and the proceeds of such income, in establishing, operating and furthering terrorist and other illegal Tech Cartels in violation of 18 U.S.C. § 1962(a);.

224. As a direct and proximate result of Defendant's violation of 18 U.S.C. § 1962(a), Plaintiffs suffered the loss of valuable property, financial services and support, and suffered other business and pecuniary damages;

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1  
2 225. Plaintiffs further allege that all Defendants did commit two or more of the offenses  
3 itemized above in a manner which they calculated and premeditated intentionally to  
4 threaten continuity, i.e., a continuing threat of their respective racketeering activities, also  
5 in violation of the RICO law at 18 U.S.C. § 1962(b);  
6

7 226. 18 U.S.C. § 1964(c) defines “racketeering activity” as (A) “any act or threat  
8 involving murder, kidnapping, gambling, arson, robbery, bribery, extortion, dealing in  
9 obscene matter, or dealing in a controlled substance or listed chemical [...], which is  
10 chargeable under State law and punishable by imprisonment for more than one year; (B)  
11 any act which is indictable under any of the following provisions of title 18, United States  
12 Code: Section 201 (relating to bribery), sections 471, 471 and 473 (relating to  
13 counterfeiting), section 659 (relating to theft from interstate shipment) if the act indictable  
14 under section 659 is felonious, section 664 (relating to embezzlement from pension and  
15 welfare funds), sections 891-894 (relating to extortionate credit transactions), section  
16 1028 (relating to fraud and related activity in connection with access devices), section  
17 1084 (relating to the transmission of gambling information), section 1341 (relating to  
18 mail fraud), section 1343 (relating to wire fraud), section 1344 (relating to financial  
19 institution fraud), section 1425 (relating to the procurement of citizenship or  
20 naturalization unlawfully), section 1426 (relating to the reproduction of naturalization or  
21 citizenship papers), section 1427 (relating to the sale of naturalization or citizenship  
22 papers), section 1503 (relating to obstruction of justice), section 1510 (relating to  
23 obstruction of criminal investigations), section 1511 (relating to the obstruction of State  
24 or local law enforcement), section 1512 (relating to tampering with a witness, victim, or  
25 an informant), section 1513 (relating to retaliating against a witness, victim, or an  
26 informant), section 1546 (relating to fraud and misuse of visas, permits, and other  
27 documents), sections 1581-1592 (relating to peonage, slavery, and trafficking in persons),  
28 section 1951 (relating to interference with commerce, robbery, or extortion), section 1952



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(relating to racketeering), section 1956 (relating to the laundering of monetary instruments), section 1957 (relating to engaging in monetary transactions in property derived from specified unlawful activity), section 1958 (relating to use of interstate commerce facilities in the commission of murder-for-hire), sections 2251, 2251A, 2252, and 2260 (relating to sexual exploitation of children), sections 2314 and 2315 (relating to interstate transportation of stolen property), section 831 (relating to nuclear materials); or any act which is indictable under the Immigration and Nationality Act, section 274 (relating to bringing in and harboring certain aliens), section 277 (relating to aiding or assisting certain aliens to enter the United States), or section 278 (relating to importation of alien for immoral purpose) if the act indictable under such section of such Act was committed for the purpose of financial gain;

227. Plaintiffs demand that judgment be entered against Defendants for no less than \$3,000,000,000, jointly and severally, including an award of trebled damages as consistent with 18

228. U.S.C. § 1964(c), compensatory and actual damages, reasonable attorneys' fees, pre-judgment interest, post-interest costs, and an award that this Court deems just and proper.

**CAUSE OF ACTION FOR**

**Conduct and Participation in a RICO Tech Cartel through a Pattern of  
Racketeering Activity: 18 U.S.C. §§ 1961(5), 1962(c)**

229. Plaintiffs repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein, and specifically repeat and re-allege the allegations under the First Cause of Action concerning RICO liability; as detailed in this full document including it's attached EXHIBITS.

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1       230.     All defendants did associate with a RICO Tech Cartel of individuals who were  
2             associated in fact and who engaged in, and whose activities did affect, interstate and  
3             foreign commerce;

4  
5       231.     All Defendants did conduct and/or participate, either directly or indirectly, in the  
6             conduct of the affairs of said RICO Tech Cartel through a pattern of racketeering activity,  
7             all in violation of 18 U.S.C. §§ 1961(4), (5), (9), and 1962(c);

8  
9       232.     During the ten calendar years preceding June 15, 2018, all Defendants did cooperate  
10            jointly and severally in the commission of two or more of the RICO predicate acts set  
11            forth in the RICO laws at 18 U.S.C. §§ 1961(1)(A) and (B), and did so in violation of the  
12            RICO law at 18 U.S.C. §1962(c);

13  
14       233.     Plaintiffs further allege that all Defendants did commit two or more of the offenses  
15            set forth above in a manner which they calculated and premeditated intentionally to  
16            threaten continuity, *i.e.* a continuing threat of their respective racketeering activities, also  
17            in violation of the RICO law at 18 U.S.C. § 1962(c);

18  
19       234.     Plaintiffs demand that judgment be entered against Defendants for no less than  
20            \$3,000,000,000, jointly and severally, including an award of trebled damages as  
21            consistent with 18 U.S.C. § 1964(c), compensatory and actual damages, reasonable  
22            attorneys' fees, pre-judgment interest, post-interest costs, and an award that this Court  
23            deems just and proper.

24  
25  
26                   **CAUSE OF ACTION FOR**

27                   **Conspiracy to Engage in a Pattern of Racketeering Activity: 18 U.S.C. §§ 1961(5),**  
28                   **1962(d) 773.**

1  
2 235. Plaintiffs repeats and re-alleges each and every allegation of the foregoing  
3 paragraphs as if fully set forth herein, and specifically repeat and re-allege the allegations  
4 under the First Cause of Action concerning RICO liability as detailed in this full document  
5 including it's attached EXHIBITS.

6  
7 236. All defendants conspired to acquire and maintain an interest in a RICO Tech Cartel  
8 engaged in a pattern of racketeering activity, in violation of 18 U.S.C. §§ 1962(b) and (d).

9  
10 237. During the ten calendar years preceding, all Defendants did cooperate jointly and  
11 severally in the commission of two or more of the predicate acts that are set forth at 18  
12 U.S.C. §§ 1961(1)(A) and (B), in violation of 18 U.S.C. § 1962(d).

13  
14 238. Plaintiffs further alleges that all Defendants did commit two or more of the offenses  
15 itemized above in a manner which they calculated and premeditated intentionally to  
16 threaten continuity, i.e., a continuing threat of their respective racketeering activities, also  
17 in violation of 18 U.S.C. § 1962(d).

18  
19 239. Plaintiffs demand that judgment be entered against Defendants for no less than  
20 \$3,000,000,000, jointly and severally, including an award of trebled damages as  
21 consistent with 18 U.S.C. § 1964(c), compensatory and actual damages, reasonable  
22 attorneys' fees, pre-judgment interest, post-interest costs, and an award that this Court  
23 deems just and proper.

24  
25 **CAUSE OF ACTION FOR**

26 **Pendant Defamation Claim Under Arkansas Law**

27  
28 240. Plaintiffs repeats and re-alleges each and every allegation of the foregoing

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1 paragraphs as if fully set forth herein; as detailed in this full document including it's  
2 attached EXHIBITS.

3  
4 241. Plaintiffs, and in particular whistle-blowers, were defamed by all defendants under  
5 Arkansas Code, Title 16, Subtitle 5, Chapter 63, Subchapter 2, §16-63-207 – Libel and  
6 Slander;

7 242. ARKANSAS CODE §16-63-207(a)(1) (2012) states: “In an action for libel or  
8 slander, it shall not be necessary to state in the complaint any extrinsic facts for the  
9 purpose of showing the application to the Plaintiffs of the defamatory matter out of which  
10 the cause of action arose. It shall be sufficient to state generally that the defamatory  
11 matter was published or spoken concerning the Plaintiffs.”

12  
13 243. In Arkansas, the ostensible “home” of the Tech Cartel wrongdoing, legal precedent  
14 requires only that “a substantial and respectable minority” of the Plaintiffs community  
15 would consider the Tech Cartel slurs to be defamatory; the so-called “majority  
16 sentiment”, a far higher standard, *cannot* be considered by either the Arkansas judge or  
17 jury;

18  
19 244. Plaintiffs whistle-blower was defamed when accused by *Correct the Record* and the  
20 *Nick Denton tabloid empire*, on behalf of the Tech Cartel this defamation was repeated  
21 each day since publication as set forth in *Exhibit* .

22  
23 245. Plaintiffs/Whistle-blowers suffered extraordinary reputational injury and, as noted  
24 throughout this complaint, devastating monetary damage to his business as an author and  
25 commentator;

26  
27 246. Plaintiffs/whistle-blower is not a “public figure”, in any sense of that term of art;  
28

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1 247. Printed publications, images and online states, *e.g.*, “***Correct the Record and the***  
2 ***Nick Denton tabloid empire FROM THE DESK OF DAVID BROCK***”, all may  
3 constitute libel in Arkansas – even if they were repeated millions of times on social  
4 media, weblog commentary, and related defamatory missives;

5  
6 248. Slander, which occurred repeatedly in this case, is spoken or transitory defamation;  
7 whistle-blowers were slandered repeatedly by Defendants owned and controlled  
8 publishing vehicles;

9  
10 249. In several separate appearances the Tech Cartel provided wholly and intentionally  
11 false renditions, set forth as fact, of whistle-blowers’s job responsibilities in an attempt to  
12 discredit whistle-blowers’s observations.

13  
14 250. All defendants, individually and collectively, attempted to destroy the reputation and  
15 business of whistle-blowers and other Plaintiffs with false statements in writing and on  
16 television.

17  
18 251. Hillary Clinton and David Brock ordered that whistle-blowers be defamed and  
19 destroyed, because Plaintiffs told the truth about organized crime within government  
20 bodies;

21  
22 252. The Tech Cartel used the same corrupt intimidation tactics, including surveillance  
23 and illegal leaks, against whistle-blowers that they are now using against competitors;

24 253. As a result of defendant’s defamation, Plaintiffs are entitled to \$50.5 million in  
25 damages;

26  
27 254. Plaintiffs will prevail as a matter of law, as the Defendant’s libel and slander was  
28 entirely and intentionally false and made with the purpose of damaging Plaintiffs, who must be

1 awarded treble damages of \$151.5 million, jointly and severally;

2  
3 **DEMANDS AND PRAYER FOR RELIEF**  
4 **(As to All Causes of Action)**

5 **DEMAND A.** For general damages, including emotional distress damages, according to the proof  
6 of each cause of action for which such damages are available.

7  
8 **DEMAND B.** For a Court order to the Social Security Administration ordering SSA to pay  
9 Plaintiffs SSDI payments, plus interest, from Jan. 1, 2007 to today as they were with-held or  
10 blockaded in reprisal for Plaintiffs assistance to the authorities. The SSA's Mario U. , a hostile  
11 witness, and other officials have acknowledge and confirmed these attacks. The referenced reports  
12 by the Inspector General have confirmed that such abuses of the SSA being "*weaponized for*  
13 *political reprisals*" are now commonplace.

14  
15 **DEMAND C.** For special damages, according to proof on each cause of action for which such  
16 damages are available.

17  
18 **DEMAND D.** For punitive damages, according to proof on each cause of action for which such  
19 damages are available.

20  
21 **DEMAND E.** For income losses from 2007 to today based on the profits from Cartel members  
22 Netflix, Google/Alphabet, LinkedIn, Instagram, Tesla as averaged by their combined annual profits  
23 which were derived from Applicants patents, companies, trade secrets, business intelligence and  
24 work using well-known and standard court metrics for business income loss based on RICO  
25 interference and attacks by Defendants.

26  
27 **DEMAND F.** For prejudgment interest and post-judgment interest according to the law.  
28

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1 **DEMAND G.** For the cost of suit incurred in this action, including attorney's fees (for such time as  
2 Plaintiffs are no longer blockaded from having counsel and retains an attorney to assist in this case  
3 rather than representing himself *pro per*).

4  
5 **DEMAND H.** For such other and further relief that the Court deems proper and just.

6  
7 **DEMAND I.** For a Court order to Google and YouTube to delete all of their server held digital  
8 attack materials on Plaintiffs produced and directed by Defendants.

9  
10 **DEMAND J.** Compensation for each of Plaintiffs patents, Per Patent Cafe, and other third party  
11 patent valuation services, and the loss of all revenue from monetization of those patents by  
12 Defendants. All of the patents having been RICO, Anti-Trust and interference blockaded and  
13 interfered with by Defendants and their control of the NVCA and Defendants executive positions  
14 within the United States Patent office and such other interferences as described at  
15 <http://www.usinventor.org>. The Court can easily look at the Patents the U.S. Government has  
16 awarded Plaintiffs as the seminal first inventor of common technologies exploited by Defendants  
17 for billions of dollars of annual revenue, at <http://www.uspto.gov>. The Court can then allocate a  
18 portion of revenues from Defendants operational years from 1978 to today, to Plaintiffs, due to  
19 Defendant's RICO and Anti-trust violating attacks on Plaintiffs because he refused to join their mob  
20 empire. In any case, the Court must order Defendants to pay for Plaintiffs un-sold and/or un-  
21 monetized issued and pending patents which were blockaded, black-listed and anti-trust interfered  
22 with by Defendants. Payments to Plaintiffs to be, at least, at fair market rates per comparable  
23 transactions over the last ten years.

24  
25 **DEMAND K.** For witness fees, informant fees, whistle-blower fees for investigative case support  
26 to the U.S. Government. For example, the FBI and SEC have been billed \$5,000,000.00 for these  
27 amounts and the case evidence files show that Plaintiffs was FIRST to provide said evidence to U.S.  
28 agencies.



1  
2 **DEMAND L.** For back-pay owed Plaintiffs, in particular for W2 payments owed Plaintiffs by  
3 companies that were attacked and put out of business, by Defendants, before they could complete  
4 all of the payments to Plaintiffs.

5  
6 **DEMAND M.** For a Court order to Gawker/Gizmodo Media to delete all of their server held attack  
7 materials on Plaintiffs which they partnered with Google/Youtube to produce and manually place at  
8 the top of their search results for years at the behest, command and control of Defendants.

9  
10 **DEMAND N.** For a Court Order to HUD and all Bay Area Counties to, today, issue Plaintiffs HUD  
11 Home Ownership certificate that Plaintiffs have waited for since 2007, but that has been with-held  
12 in reprisal or blockaded in reprisal for Plaintiffs assistance to the authorities. The Court will note,  
13 that during the period from 2007, to today, over 30,000 other Applicant's, the majority of whom  
14 were less-qualified per the HUD metrics and federal laws, for the certificate, which they all received  
15 with little effort. Defendants took Plaintiffs 2 bedroom home from him in Noe Valley, San  
16 Francisco, by blockading all his SSA funds and then blockaded him from getting a home by  
17 blockading all of his HUD funds.

18  
19 **DEMAND O.** A declaration pursuant to 28 U.S.C. §§ 2201 and 2202 and 5 U.S.C. § 706(2)(B) that  
20 the denial of 'Plaintiffs funding and benefits applications was unlawful, and compensatory and  
21 injunctive relief directing GOVT to approve same.

22  
23 **JURY TRIAL DEMAND**

24 Plaintiffs, SCOTT DOE, demands trial of this matter by jury. The amount demanded exceeds  
25 \$25,000.00 (Government Code § 72055). Damages claim dollar amount of \$300,000,000.00 is equal  
26 to only three hours of income for Defendants.

27  
28 DATED this day of the filing of 2022

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Respectfully submitted,

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**ADDITIONAL DETAILS**

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1 NOTE: As part of his demands, Plaintiffs are requesting relief under the United States Constitution,  
2 the Federal Tort Claims Act (“FTCA”), 28 U.S.C. §§ 1346(b), 2672 and related jurisdictions and  
3 applicable rights.

4  
5 NOTE: Plaintiffs hereby also pleads with the Court for: (A) A “JOHN DOE’ filing status; (B) A  
6 judge or magistrate who holds no stock ownership, or personal relationships, in Valic/AIG or the  
7 Silicon Valley Cartel companies; (C ) The appointment of Counsel by the Court; (D) Fee Waivers;  
8 (E) the right to EFILE. (F) a Court-ordered demand to the FBI to provide the ‘FBI 302’ reports on  
9 each of the named attackers, listed below and (G) damages as specified.  
10

11  
12 NOTE: As hundreds of investigations, (from Durham, to FBI, To SEC, To Congress, To  
13 Propublica, et al) have now revealed: Standard operating procedure for government officials  
14 involves the hiring of spy of agency operatives to attack competing, or whistle-blowing, citizens  
15 with spy agency tools and ‘dirty tricks’ tactics. These United States Government politicians  
16 exchange payola, bribery and other compensation in these schemes via stock market securities and  
17 rigged insider trading. Investment banker husbands often stage their spouses to be ‘Senators’ or  
18 other political high-end functionaries and then get them to make laws that benefit their investment  
19 bank ownerships.  
20

21  
22 NOTE: While Plaintiffs damages amount may seem to be a large amount to the naive and unaware,  
23 the Defendants make that amount every day EACH FEW HOURS, from corruption-based gains.  
24 Much of that profit was made off the work of Plaintiffs by copying his patents, trade secrets,  
25 business models, start-up companies and innovations, which Plaintiffs deployed years before any of  
26 the Defendants, and by engaging in Racketeering, RICO violations, bribery, monopolies and ant-  
27 competitive and reprisal attacks to prevent Plaintiffs from competing and from whistle-blowing.  
28

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1  
2 Many billions of dollars of illicit ‘unjust gains’ have been transacted this way by Defendants.  
3 Plaintiffs are suing the United States Government because that body: financed, operated, provided  
4 the tools for, staffed, manipulated policy for, created unique exclusions for the Defendants of,  
5 ignored police reports about, and otherwise, operated command and control of the attacks, anti-  
6 competitive actions, IP violations and harms to Plaintiffs which Plaintiffs shall prove in this trial  
7 with first-hand knowledge and internal eye-witness testimony already filed with federal law  
8 enforcement, Congress and regulatory agencies. Plaintiffs reported information to Federal law  
9 enforcement and Congressional committees which, if properly acted upon by authorities, would  
10 have removed a seated President and Vice President from office. The President and the Vice  
11 President steer trillions of dollars to political campaign financiers, particularly those in Silicon  
12 Valley. This was the reason Defendants used such extreme spy tactics, opposition research attacks  
13 and Fusion GPS/Black Cube-type ‘hit-jobs’ on Plaintiffs, using government resources.  
14  
15

16  
17 NOTE: Plaintiffs have been a multi-decade resident of San Francisco since he moved there to  
18 continue his education in criminology and media documentation via local universities. Plaintiffs  
19 superlative law enforcement and state licensing credentials go back to this period. His residences at  
20 20<sup>th</sup> Street, Vallejo Street, Green Street and Chenery Street were visited by, and cohabited, with  
21 “famous” political figures. Plaintiffs are featured in ‘hug’ photos and videos with the most senior  
22 White House insiders. The daughter of a Mayor of San Francisco and a Bay Area Senator stayed  
23 overnight at the residence, often, and partied and enjoyed the backyard hot-tub. The senior staff  
24 member of Nancy Pelosi dated Plaintiffs. Plaintiffs lived in the home of Dianne Feinstein’s office  
25 coordinator.  
26

27 Major City Hall figures kept dating Plaintiffs and revealing all of the inside dirt to Plaintiffs because  
28 they wanted Plaintiffs to run for office. Regional Congressional officials, Judges and Magistrates,

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1 agency officials and other public officials have attempted to stall, delay or obfuscate this filing  
2 because they hold stock market securities ( through which bribes are paid ) and other financial,  
3 political and personal interests in the Defendants companies. This fact is easily confirmed, by any  
4 party, via a simple forensic database cross-comparison analysis between the FINCEN, DOJ,  
5 XKEYSCORE, FBI, INTERPOL, ICIJ, SEC and GAO financial crimes databases. Federal law  
6 enforcement criminal referrals have been, and will be, filed for each person confirmed to be so  
7 doing.  
8

9  
10 High-level City Hall family members helped Plaintiffs, with support from the regional Universities,  
11 produce a 10 segment documentary film series called: “*City Circus – The Insiders*”, which featured  
12 everyone from Melvin Belli, to James Bronkema to George Moscone revealing, on camera, how  
13 payola corruption works from SFO to DC. Plaintiffs have received multiple Mayoral, White House  
14 and State proclamations and written commendations and has been awarded, by the United States  
15 federal government, many seminal patents as First *Inventor-Of-Record* of the core technologies and  
16 business models which support over 50% of Silicon Valley ‘Big Tech’ . It is well proven that  
17 Plaintiffs had ‘superior knowledge’ of political corruption in San Francisco and has so testified  
18 regarding ongoing, active, investigation matters to the FBI, DOJ, FinCen, Interpol, EU, GAO, IG,  
19 AG, SEC, FTC, Congressional Ethics teams, the Durham investigations and other high-level law  
20 enforcement and regulatory officials.  
21

22 Also related are: SFPD Case # **150528148** ( - Company E (Northern District) Per Officer Liu –  
23 Badge # 4742 ) is relevant. Police incident report # **25119268** is relevant. OSC Case File No. **MA-**  
24 **19-002006** is relevant. OSC Case File **DI-15-4541** is relevant. California Victim Compensation &  
25 Government Claims Board Claim # **G628261** is relevant. Also relevant are: Case No. **1:20-cv-**  
26 **03010** ( Google monopoly and competitor attacks case); Case No. **11-CV-2509** (  
27 <https://www.cand.uscourts.gov/judges/koh-lucy-h-lhk/in-re-high-tech-employee-antitrust-litigation/>  
28

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1 );

2 Task force Case No. **20-xyz2020a** ( <http://www.case-xyz2020a.com/> ); Case No. **20-03664** (

3 <https://www.insurancejournal.com/app/uploads/2020/06/brown-v-google.pdf> ); Case No. 1:12-CV-

4 00774-mms and related cases. ( [https://thehill.com/blogs/congress-blog/the-administration/250109-](https://thehill.com/blogs/congress-blog/the-administration/250109-a-case-study-in-pay-to-play-cronyism)

5 a-case-study-in-pay-to-play-cronyism. Criminal referrals against the attackers have been filed with

6 the FBI, DOJ, SEC, FEC, FTC ); Case No. **18-cv-8865** (S.D.N.Y.)(SEC v. Elon Musk for lies and

7 scams ); Case No. **18-cv-8947** (S.D.N.Y.)( SEC v. Tesla, Inc. for lies and scams ); Case No. **1:14-**

8 **cv-270143** ( Google racketeering charges - [https://artistrightswatch.com/2017/10/08/googles-](https://artistrightswatch.com/2017/10/08/googles-racketeering-challenge/)

9 racketeering-challenge/ ); Case No. **1:19-cr-00490** ( United States v. Epstein - Big tech sex cult

10 crimes case ); Case No. **129 So.3d 1196** (Fla. 2d DCA 2014); 170 So.3d 125 (Fla. 2d DCA 2015)

11 ( Gawker Media, LLC v. Bollea in which Gawker, Deadspin, Gizmodo, Jalopnik, Jezebel, Kotaku

12 and Lifehacker were exposed as character assassination and money-laundering fronts working for

13 notorious third parties); Case No. **19-cv-343672** James Martin (on behalf of ALPHABET INC) v

14 Larry Page et al (Sex Cults In Silicon Valley ); Case No. **CGC-11-508414**, California Superior

15 Court, San Francisco (Plaintiffs v Google ); Case No. **3:16-cv-03061** U.S. DISTRICT COURT,

16 NORTHERN DISTRICT OF CALIFORNIA, San Francisco Division ( Plaintiffs V.

17 Google/Alphabet/YouTube); Case No. **18-CIV05380** Rubin Vs. Rubin (Google sex cult and sex

18 slave charges ); Case No. : **1:17 - cv - 06404** Vs. Rubin (Organized crime sex trafficking stock

19 market manipulators ); Case No. D.C. No. **3:17-cv-05369** - VC (Big tech harassment of

20 outsiders);Case No. **3:21-cv-00077** (Another of many lawsuits proving that the Silicon Valley

21 Cartel conspires to manipulate media and markets) and the SFPD Roger Boas case records.

22

23

24

25

26 Plaintiffs provided tips which resulted in the FBI raid of Solyndra and is a major promoter of the

27 U.S. JOBS ACT and the Congressional STOCK ACT. Plaintiffs was encouraged to run for Mayor

28 of San Francisco as part of a multi-agency anti-corruption taskforce effort to break up an organized

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1 corruption “*Enterprise*” which had permeated City government and was based around an ongoing  
2 and massive sex-trafficking operation for San Francisco “elites”. The successful effort indicted one  
3 City Hall executive, who ran a City Hall brothel for public officials, detailed in police reports and  
4 arrest records, and indicted another for abuse of his daughter and corruption. FBI staff have referred  
5 to San Francisco as “*one of the most corrupt cities in America*”, San Francisco’s local anti-  
6 corruption lawyer: Harmeet Dhillon is constantly on national TV disclosing epic corruption in San  
7 Francisco. Renown anti-corruption reporters: Tim Redmond, Phil Matier and Andy Ross have  
8 found that they have so many corruption and bribery stories to report on that they can barely catch  
9 their breath. Senior San Francisco FBI agent Peter D. Cair, known as “*The Elliot Ness of San*  
10 *Francisco*” has been plowing through corruption at Netflix, and other bay area political financiers  
11 and business partners of White House senior executives and Congress members, with arrest after  
12 arrest. The Daily Mail global news outlet, with one of the largest news readerships in the world,  
13 reports on San Francisco corruption almost daily. The endless, ongoing, tsunami of corruption  
14 arrests of San Francisco political figures validates the assertion of endemic organized corruption  
15 and quid pro quo being the soul of government operations between SFO and Washington, DC.  
16  
17 Plaintiffs finds it sad that, these days, the name of his friend: *George Moscone* is not as well known  
18 nationally as “*Shrimp Boy*”.

19  
20 Some major public officials, and their family members, invited Plaintiffs to join the corrupt  
21 enterprise wherein, to this day, Defendants employ a layered and tentacular stock market covert  
22 bribery scheme to funnel payola through securities transactions. Plaintiffs did not comply with  
23 Defendants enterprise participation request but did provide information to federal law enforcement.  
24 Major regional law firms and former regional and Washington, DC law enforcement officials held  
25 these corrupt stocks and participated in ‘unjust gains based on criminal corruption’ according to the  
26 U.S. Treasury. Law firms Latham Watkins, Perkins Coie and Wilson Sonsini are now under federal  
27 and international investigation for corruption, spying and other manipulations via Durham, FBI,  
28



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1 FinCen, FTC and other entities. This clearly shows that nearly every law firm related to this effort  
2 has been compromised with conflicts of interest, making it impossible for Plaintiffs to acquire  
3 qualified legal representation.

4  
5 Plaintiffs are, **BOTH**, a litigant against the United States and a provider of law enforcement  
6 specialty services TO The United States and Congress, at the same time.

7  
8  
9 ***To be clear: Public officials including Mayors, Members of Congress, White House Executives***  
10 ***and agency bosses own and operate Plaintiffs competitors, de-funded Plaintiffs in political and***  
11 ***anti-competitive reprisal and hired political dirty tricks operatives (as exposed in the Durham and***  
12 ***ICIJ reports) to run ‘hit-jobs’ against Plaintiffs as detailed in the evidence attached! Government***  
13 ***officials decided to help themselves instead of helping the citizens that hired them!***

14  
15  
16 Other major public officials, and their family members, revealed the operations of the enterprise and  
17 told Plaintiffs: “My Mom can have her people get into any HUD, SSA, DOE, or other government  
18 database and cut off all the funding and benefits for any person that she does not like and nobody  
19 can trace those moves...”. **In fact the government officials did just that** in reprisal for Plaintiffs  
20 assistance to law enforcement. Government officials used tricks and manipulations as described in  
21 Ronan Farrow’s popular book: ***Catch And Kill***, to open, hack, manipulate, change, alter, delay and  
22 affect Plaintiffs SSA, HUD and DOE funding in an effort to “...totally ‘kill him’. Cut off every  
23 possible source of funding he can get. Wipe him off the planet by destroying all of his cash  
24 options...” , per one party who is a family member of a famous politician. This was done in reprisal  
25 because of Plaintiffs whistle-blowing and law enforcement efforts and because the U.S. Patent  
26 office had stated that Plaintiffs had invented, and was first to operate in commerce as the technology  
27 operating Facebook, YouTube, Google/Alphabet, Tesla: The very companies covertly, anti-trust  
28

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1 violation, owned by the public figures in question and the very companies that pay for those public  
2 figures political campaigns are also the very companies charged with corruption by FTC, SEC,  
3 FEC, DOJ, etc. That would seem to be a vast violation of the RICO Laws. The Inspector General  
4 and the Courts have documented thousands of such cases where public officials used government  
5 resources, and spy agencies, for reprisal attacks on citizens who told the truth about crime.  
6 Plaintiffs, and his peers, filed lawsuits against the ex-spy agency hired attack services (some of  
7 whom were charged when DEA found 4+ tons of cocaine on their airplanes), The U.S. Government  
8 and The Department of Energy. Plaintiffs won his remand case, proving that his funding was cut off  
9 by crony government officials infected by corruption, he got the AG and the Secretary of Energy  
10 fired for corruption and cronyism and created new anti-corruption legal precedents.  
11  
12 Whereas White House executives, U.S. Senators, and Government agency executives colluded with  
13 Silicon Valley oligarchs, operating, together, as an “*Enterprise*”, to coordinate insider stock market  
14 ‘*Stimulus Scams*’ that involved funding blockades, blacklists, contracted tabloid media  
15 assassinations and RICO Racketeering law violations, Anti-trust law violations, IP law violations,  
16 lobbying law violations and various civil and criminal acts that harmed domestic citizens and  
17 Democracy. This case matter is well known to Courts, media, federal law enforcement and in nearly  
18 a million news articles. It is not possible for this Judge, who knows many of the participants in this  
19 case, to not have seen the conflict of interest herein, at first blush.  
20  
21  
22 A simple cross-comparison of the ICIJ, FINCEN, Interpol, SEC, GAO forensic accounting and  
23 XKEYSCORE, et al, databases proves the illicit financial interactions between Defendants. Such a  
24 check can be technically accomplished within 60 minutes, or less, according to federal IT experts.  
25  
26 For example: Almost every single investor of Elon Musk is also the primary financier and  
27 beneficiary of the politicians, and their Congressional shenanigans, that used taxpayer money and  
28 resources to give Musk's companies all that free money. For example, Dianne Feinstein's family run

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1 the HR service (Herb Newman), the construction company, the railroads, the building leases  
2 (CBRE), the China funds (Mart Bailey, Steve Westly, Steve Spinner, et al) and swap staff members  
3 for Tesla and Solyndra. Feinstein and Pelosi blocked funding for all Tesla competitors for the same  
4 State and Federal cash and tax waivers and for the NUMMI factory. The government politicians,  
5 personally, made billions off insider trading, pump-and-dumps and payola. Have you ever  
6 wondered how Congress could have FIVE YEARS of a huge number of hearings about Facebook's,  
7 Google's, Tesla's and Alphabet's crimes against society, tax evasions, money-laundering and other  
8 evils... and YET..NEVER BE ABLE TO ENACT ANY REGULATIONS ON THOSE  
9 COMPANIES!!??  
10

11 It is because half of Congress owns, and gets paid by Facebook's, Google's, Tesla's and Alphabet's  
12 crimes against society... See how that works? Parents are still sickened by the horrific things that  
13 Big Tech does to our kids We can thank our Senators that own those tech companies and do their  
14 bidding like obedient little dogs!

15 Felonies? You Bet!

16  
17 Plaintiffs lived with, worked with and was invited into their crimes by these official representatives  
18 of the United States Government. Defendants used the United States Government, The White House  
19 and various government agencies to engage in their crimes and to harm Plaintiffs in reprisal for  
20 whistle-blowing and for competing with them. The United States Patent Office has issued thousands  
21 of pages of validated research proving that Plaintiffs was the first to invent, found and operate the  
22 very business technologies and business models that were copied and now owned by United States  
23 Government officials including those senior members of Congress, The White House and various  
24 agencies. Plaintiffs are a key promoter of THE STOCK ACT, in Congress, which is a law seeking  
25 to cut off all politicians and government employees, and their families, from owning any stock,  
26 because that is how all modern bribes have been paid, and were paid, in this case.  
27  
28

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Plaintiffs timely filed administrative complaint with multiple complaints, on a weekly basis, for the last six months, updated weekly as federal and news investigators supply new evidence of harms and crimes to Plaintiffs. Plaintiffs have filed multiple federal STANDARD FORM 95 Complaints on a regular basis and has filed regularly updated 1000+ page complaints as attached to this complaint. Plaintiffs have had a 24 hour, around the clock online data service operated FOR the FBI, The DOJ, The FTC, The SEC and Congressional Investigators so that each of those parties can receive evidence updates on an immediate basis and those agency IP Addresses, IMEI Codes and Domains have regularly visited the site, proving that had complaint knowledge. Additionally, every day, including today, informants, whistle-blowers, investigators and others provide new and confirming data. Additionally, at least 60% of the reprisal attacks listed in the attached evidence are ongoing, as recently as the day of this filing, a fact proving that there has been no exclusion by any statute of limitations. Additionally, Plaintiffs have had daily and/or weekly communication, so stating the reasons for his complaint to over 200 senior government officials including:

11. Sarah Winslow – Organized Crime, US-DOJ
- Stephanie Hinds - Organized Crime, US-DOJ
- Merrick Garland – US DOJ AG
- [ADRWeb@usdoj.gov](mailto:ADRWeb@usdoj.gov) - Antitrust Foia Web Mailbox (ATR)
12. Antitrust Foia Web Mailbox (ATR) - [Antitrust.Foia@usdoj.gov](mailto:Antitrust.Foia@usdoj.gov)
13. Antitrust.complaints - [antitrust.complaints@usdoj.gov](mailto:antitrust.complaints@usdoj.gov)
14. Askcrs - [askcrs@usdoj.gov](mailto:askcrs@usdoj.gov)
15. AskDOJ - [AskDOJ@usdoj.gov](mailto:AskDOJ@usdoj.gov)
16. ATR-Antitrust - Internet (ATR) - [antitrust.atr@usdoj.gov](mailto:antitrust.atr@usdoj.gov)
17. Display Name: ATR-NCRPAnotifications (ATR) - [ATR.NCRPAnotifications@usdoj.gov](mailto:ATR.NCRPAnotifications@usdoj.gov)
18. Colthurst, Tom (USACAN) -[Tom.Colthurst@usdoj.gov](mailto:Tom.Colthurst@usdoj.gov)
19. Devin.omalley - [devin.omalley@usdoj.gov](mailto:devin.omalley@usdoj.gov)
20. Dintzer, Kenneth (CIV) - [Kenneth.Dintzer@usdoj.gov](mailto:Kenneth.Dintzer@usdoj.gov)
21. Elder.justice - [elder.justice@usdoj.gov](mailto:elder.justice@usdoj.gov)
22. Foster, Wayne (ATR) - [PMWayne.Foster@USDOJ.gov](mailto:PMWayne.Foster@USDOJ.gov)
23. Hoffman, Hallie (USACAN) - [Hallie.Hoffman@usdoj.gov](mailto:Hallie.Hoffman@usdoj.gov)
24. ITVERP - [ITVERP@usdoj.gov](mailto:ITVERP@usdoj.gov)
25. kathy.hsu - [kathy.hsu@usdoj.gov](mailto:kathy.hsu@usdoj.gov)
26. Lo, Michelle (USACAN) - [michelle.lo@usdoj.gov](mailto:michelle.lo@usdoj.gov)
27. MRUFOIA Requests - [MRUFOIA.Requests@usdoj.gov](mailto:MRUFOIA.Requests@usdoj.gov)
28. Pamela.Johann - [Pamela.Johann@usdoj.gov](mailto:Pamela.Johann@usdoj.gov)
29. Ravi.narayan - [ravi.narayan@usdoj.gov](mailto:ravi.narayan@usdoj.gov)
30. Santiago, Olga (OJP) - [Olga.Santiago@usdoj.gov](mailto:Olga.Santiago@usdoj.gov)
31. Schoenberger, Carina (USANYN) - [Carina.Schoenberger@usdoj.gov](mailto:Carina.Schoenberger@usdoj.gov)
32. Sharanya.Mohan - [Sharanya.Mohan@usdoj.gov](mailto:Sharanya.Mohan@usdoj.gov)
33. USAEO-VictimOmbudsman - USAEO-VictimOmbudsman

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34. USAFLN.Corruption - USAFLN.Corruption@usdoj.gov  
35. USAWVS.Corruption - USAWVS.Corruption@usdoj.gov  
36. USTWeb - ustrustee.program@usdoj.gov  
37. Wawrzyniak, Katherine (USACAN) - Katherine.Wawrzyniak@usdoj.gov  
38. Wendy.garbers - wendy.garbers@usdoj.gov  
39. Winslow, Sara (USACAN) - Sara.Winslow@usdoj.gov  
40.  
41. Plaintiffs have met with the FBI on numerous occasions but was told: “..we take years to investigate anything involving big shots in Washington, DC..” to “We can’t comment on an active investigation (which means that there IS an active investigation)...”related to  
42. By letters and emails dated across the course of the last year, the DEFENDANT denied Plaintiffs administrative claim. In the denial notification, GOVT. advised Plaintiffs that if Plaintiffs disagreed with the denial, Plaintiffs had the right to file suit in federal district court “no later than six months after the date  
43. This instant suit is timely filed under the FTCA, 28 U.S.C. § 2401(b), as it is being filed within six months of the date of the mailing of the denial of the administrative claim. Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called diversity of citizenship case, no defendant may be a citizen of the same State as any Plaintiffs,  
44. Plaintiffs demands a jury trial.  
45. Plaintiffs have obtained a GOVERNMENT (“GOVT”) award grant from the United States Congress, under the Iraq War Bill, has received

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commendations from the Congress and from the federal government's various premier high technology research organizations.

46. Plaintiffs have been associated with the White House and government agency projects, in technology development and law enforcement investigation, since 1978.

47. Plaintiffs are a disabled, senior who is on a fix income from social security which validates the reason for him to receive all fee waivers and expediting in this case matter.

48. Plaintiffs have been a victim of disabling attacks, media hit-jobs, and defunding reprisals were launched against Plaintiffs by DEFENDANT, who were both government employees and contractors AND owners of Plaintiffs competitors AND, stock market profiteering beneficiaries.

49. The Plaintiffs have been subjected to the malicious attacks of the operator, black-lists, and reprisal defunding attacks on Plaintiffs.

50. The Plaintiffs have been victimized based on a vendetta for reporting crimes that resulted in indictments, arrests, and terminations of DEFENDANT and their associates.

51. This can be considered as an action of an "Enterprise," a RICO law violating, anti-trust law which is done in the violating scheme to steal stimulus funds that continue to this day.

52. DEFENDANT is the U.S. Government ("GOVT"), a government body.

Plaintiffs have reported to, and interacted with, said entity through various agencies such as the DOE, DOJ, FBI, SEC, FTC, OPM, GAO, FEC, FERC, HUD, SSA. The White House and related agencies, all have and participated

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1 in cover-ups, attacks, reprisals, defunding, defamation, RICO violations, and  
2 related crimes and abuses.

3 53. Pursuant to §136 of the Energy Independence and Security Act of 2007, 42  
4 U.S.C. § 17013, the U.S. Department of Energy (“GOVT”) administers the  
5 Advanced Technology Vehicle Manufacturing (ATVM) loan program to  
6 support the manufacture of advanced technology vehicles and components in  
7 the United States. In 2008, Congress authorized the GOVT to make \$25  
8 billion in ATVM loans. GOVT currently has over \$16 billion of unused  
9 lending authority. Congress-people, GOVT agency executives and their  
10 Silicon Valley financiers invested in stock ownerships of the upside collateral  
11 profits from the manipulation of the Department of Energy and foreign  
12 mining benefits from Iraq, Afghanistan, and other foreign mining regions.

13 54. The public officials operated a profiteering swindle based on the exploitation  
14 of stocks from government policy financed energy and mining deals and they  
15 operated this scheme in violation of RICO, anti-trust, civil rights, and other  
16 law violations. The perpetrators ‘before’ and ‘after’ stock market account  
17 records and leaked private emails and phone calls prove this. DOJ, FTC, and  
18 SEC are strongly encouraged to expand their criminal investigation into short  
19 selling by hedge funds and research firms benefiting politicians as bribery  
20 payola. Federal law enforcement must more deeply scrutinize the symbiotic  
21 covert relationships between Senators and tech companies and hunt for signs  
22 that improperly coordinated trades broke laws to create profiteering schemes  
23 for corrupt U.S. Senators. ie: [https://www.businessinsider.com/conflicted-](https://www.businessinsider.com/conflicted-congress-key-findings-stock-act-financesinvesting-2021-12)  
24 [congress-key-findings-stock-act-financesinvesting-2021-12](https://www.businessinsider.com/conflicted-congress-key-findings-stock-act-financesinvesting-2021-12)  
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55. The federal probes have revealed significant and pertinent information.

Currently, the federal probe ran by the DOJ fraud section with federal prosecutors in Los Angeles. They are digging into how hedge funds tap into research and set up their bets, especially in the run-up to the publication of reports that move stocks. For example, in the “Fake McKinsey White Papers” created by Kleiner Perkins, Draper Fisher, Greylock, et al is a classic example. These publications were used to manipulate energy markets for Tesla, batteries, solar and etc.

56. McKinsey produced and released hundreds of biased reports for the Obama financiers to push “Cleantech” and lithium-ion batteries which Obama’s financiers exclusively owned. McKinney’s founder is quoted as promoting “monopolies” and “competitor destruction via lies.”

57. “While one is prying into financial relationships between hedge funds and researchers, and hunting for signs that money managers sought to engineer startling stock drops or engaged in other abuses, such as insider trading, the California politicians must not be ignored, protected, or given a pass because they are friends with some DOJ officials or because it is “politically embarrassing” for certain elitists social lives...”

58. Plaintiffs have sworn, warranted, and certified that these West Coast politicians are engaging in felony organized crime using the stock market to receive bribes from companies that they favor, and, or own.

59. Tellingly, in this inquiry’s sweep means federal investigators are examining trading in at least several dozen stocks, including well-known short targets such as Luckin Coffee Inc., Banc of California Inc., Mallinckrodt Plc and GSX Techedu Inc.

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60. All reporters are watching to see if they hear that any federal investigators are ignoring the SpaceX, Tesla, Netflix, Google, Instagram, Facebook, etc. stock market payola to politicians because there will be hell to pay.

61. Peter D. Cair is referred to as the FBI's "Elliot Ness" in San Francisco. He busted one of the early NETFLIX stock swindles. More recently, Other Netflix engineers were caught in stock frauds. Plaintiffs have asked why did the investigations not, though, go all the way up to Obama and Susan Rice and their Netflix "trades"?

62. The federal investigators must scrutinize over one hundred tech firms WITH the help of unbiased SEC and FTC investigators and those investigations are underway.

63. Toronto-based Anson Funds and anonymous researcher Marcus Aurelius Value are among the firms involved in the inquiry.

64. Other prominent firms that circulated research on stocks under scrutiny include Carson Block's Muddy Waters Capital and Andrew Left's Citron Research. The investigations, though, **MUST** look at the deeply compromised McKinsey Consulting, which the Silicon Valley oligarchs lobby the feds to avoid looking.

65. The U.S. probe finally opens yet another front in an already treacherous era for those who try to profit on stock drops. Some bearish funds gave up as government stimulus buoyed prices during the pandemic. That pressure intensified as retail investors organized counterattacks on popular short targets, bidding up shares to inflict losses on hedge funds, this year. By late January, Citron vowed to give up short-selling research and focus on long bets.

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66. Meanwhile, companies criticized by short-sellers have become increasingly bold in firing back, sometimes launching legal battles even as they face government probes that support short-sellers such as theses. Several corporate executives have been hoping U.S. authorities might help to further shift the focus to investors' tactics. Some examples of companies in which there are government probes are Eric Schmidt, Larry Page, Elon Musk, Mark Zuckerberg, Steve Jurvetson, Goguen, et al.
67. Government attorneys are trying to determine whether short-sellers engaged in some form of deception -- say, by misleading the public about their financing of independent research, violating confidentiality agreements with authors, or orchestrating stock plunges to panic shareholders and exacerbate selling. The reality is that THEY DID and West Coast politicians' profit from those crimes as payola.
68. DOJ has a database to look at every cent that moved in and out of various accounts of members of Congress. Nancy Pelosi's has over twenty-two and more family trusts, bank accounts, and investment bank funds for the last 20 years. The evidence is overt and tracks straight back to the "Enterprise," but it is DEEPLY covered up by those who are friends with Pelosi at DOJ and other agencies. These crimes have been covered up. These blatant acts are in themselves a felony. If it were the average person, criminal charges would have been filed. Not in this case, instead, these criminal acts are swept under the rug. There is no harm or damage to these parties only that the parties are getting richer without the public knowing what really is going on behind the silent curtain.

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69. Hedge funds are known to strike a wide variety of deals with researchers, sometimes paying handsome subscription fees for fresh insights into possible corporate trouble, or even becoming an author's primary source of funding. In one example, prominent financial investigator Harry Markopolos, who normally makes money from whistle-blower awards, said he partnered with a hedge fund to share profits when he released a report on General Electric Co. Politicians get the profits from such deals in exchange for keeping competitors to Tesla and SpaceX from getting funded.
70. Some hedge funds have been known to suggest targets to researchers, who then deliver scathing reports that harm companies that Senators own the stocks in.
71. One cautionary tale emerged in court after Dallas-based Sabrepoint Capital agreed to pay a short-selling researcher a monthly retainer of \$9,500 in 2018. Sabrepoint encouraged him to dig into real estate company Farmland Partners Inc. The researcher, who also wrote publicly under a pseudonym, later published an article on Seeking Alpha, setting off a 39 percent drop in Farmland's share price. The company sued and used a judge's order to force him to reveal his identity: Quinton Mathews
72. The entire stock market just is a well-oiled fraud that only profits a few oligarchs and most West Coast Senators.
73. Mathews later said in a statement that he subsequently "learned" his article "contained inaccuracies and false allegations" and retracted it. He and Farmland reached a settlement. Sabrepoint has said it did not know about the Seeking Alpha article.

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74. Farmland also is on the list of stocks that the Justice Department is examining. Lawyers for Sabrepoint and Mathews declined to comment.
75. The Justice Department unit managing the inquiry already has a formidable reputation on Wall Street. It recently brought several cases against global banks and traders for illegal spoofing of precious metals and Treasury futures. As part of that probe, JPMorgan Chase & Co. paid more than US\$900 million in penalties after its traders placed and canceled orders for commodities to benefit positions held by the bank or prized hedge fund clients. Those cases were brought by analyzing trading data for suspicious patterns and then attributing it to individual traders. The DOJ must GO TO THE TOP of these mobsters and take out Goldman Sachs bosses and U.S. Senators that run this MAFIA and the Elon Musk's and Eric Schmidt's that are their operatives.
76. While prosecutors in the short-selling investigation issued subpoenas as recently as October, the effort has been underway much longer. It is time for perp walks of Senators and not just the low-level flunkies. The DOJ will find out the truth and end fracas.
77. These inquiries gained momentum after U.S. lawmakers called for more scrutiny of short-sellers following the so-called meme-stock trading frenzy that erupted in January. In a single week that month, retail investors sent the price of GameStop Corp. soaring more than 700 percent before brokerages began limiting bets. Some organizers of the buying spree claimed hedge funds had been unfairly using their market influence to drive down stocks.
78. The compromised Senators have held multiple hearings on the fracas, at times discussing whether to force short sellers to boost disclosures but their

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1 hand-wringing is all for show. There is no real intent to expose or show what  
2 is really going on. These Senators fear that if the truth comes out. It will have  
3 a devastating impact on not only them personally but all those associates as  
4 well.

5 79. Academics have been encouraging U.S. authorities to address the possibility  
6 that short sellers are laying out their cases against stocks, then using the  
7 impact of that news to quickly reap gains and quietly move on.

8 80. Early last year, Mitts and about a dozen other prominent securities-law  
9 professors urged the SEC to write rules requiring that short sellers who  
10 voluntarily reveal bets against a stock be required to disclose when they have  
11 exited the position. The professors also asked the regulator to write a new  
12 rule that would make closing a short position immediately after disseminating  
13 a negative report -- with an intent to do so upon publication -- constitute  
14 market manipulation.  
15

16 81. One of the most powerful lawmakers in the U.S. defended the right of  
17 congresspeople to trade stocks. Pelosi, Feinstein, Reid, Harris, and other  
18 California politicians own Silicon Valley companies Google, Facebook,  
19 Netflix, Apple, Facebook, Tesla, SpaceX, and YouTube which provides them  
20 funds and cash. They defund their competitors and put hit-jobs on those  
21 competitors, who are their own constituents. These politicians block  
22 government actions that would regulate these companies and laws designed  
23 to control the corruption and public safety hazards of these companies.  
24

25 82. When asked about the issue during a press conference, House Speaker Nancy  
26 Pelosi (D-Calif.) said that "We're a free market economy" and lawmakers  
27  
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"should be able to participate in that." That reply was an insincere, pandering, smokescreen of a lie

83. When asked about the issue during a press conference, House Speaker Nancy Pelosi (D-Calif.) said that "We're a free market economy" and lawmakers "should be able to participate in that." That reply was an insincere, pandering, smokescreen of a lie!

84. For example, Pelosi's own stock portfolio, which gained over \$65 million in value between 2019 and 2021, has often been the subject of scrutiny. The Stop Trading on Congressional Knowledge (STOCK) Act, which was passed in 2012, is designed to combat insider trading by lawmakers, who many across the spectrum argue have too much access to inside information to be able to trade stocks ethically. In October, the Federal Reserve banned its officials from owning individual stocks. In March 2020, four senators were accused of insider trading and investigated by the Justice Department when they sold off stocks ahead of the COVID-19-induced economic downturn.

85. Voices across the spectrum, especially on the right but also on the left, criticized Pelosi's comments and questioned her position. Many argue that lawmakers since have access to information that the public does not, and because they also can write and pass policy, they should not be allowed to buy and sell individual stocks and other assets. Some on the right highlighted silence from other progressives in response to Pelosi's statement despite their previous opposition to the practice.

86. Nancy Pelosi owns more than \$500,000 in Apple stock, according to her financial disclosure reports. Pelosi is also the speaker of the House.



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1 Congressional Democrats and Republicans alike have introduced multiple  
2 antitrust bills that would affect Big Tech companies.

3 87. The CEO of Apple, Tim Cook, called Pelosi personally in June and told her  
4 not to move ahead on these bills. The House Judiciary Committee passed six  
5 of these bills in June. Not one of them has seen movement on the House floor  
6 in six months, with some reports pinning the inaction on the speaker.

7  
8 88. In January of 2021, Pelosi's husband, Paul, bought at least a quarter million  
9 in "call" options for Apple, which is a more sophisticated way of betting on a  
10 stock going up in value. Paul Pelosi also bought at least half a million in call  
11 options for Tesla, which stood to get subsidized by the Build Back Better bill  
12 his wife shepherded through the House.

13 89. Pelosi and her family are already extraordinarily rich, and nobody but the  
14 Pelosi's. themselves knows the motivations of Nancy Pelosi or the  
15 calculations of Paul Pelosi. But still, it ought to raise eyebrows that the  
16 speaker of the House keeps taking actions that benefit her stock portfolio and  
17 not the public. The leader of the House such as Pelosi should not take  
18 advantage of the public trust.

19  
20 90. Yet. Pelosi has stated that there should be no restrictions on her ability to buy  
21 and sell stocks in the companies Plaintiffs are regulating, subsidizing,  
22 protecting, and taxing. Pelosi, says lawmakers/Capitol staff should not be  
23 prohibited from trading stock: "This is a free market, we are a free-market  
24 economy, they should be able to participate in that."

25  
26 91. Pelosi has a long history of entangling her policymaking with her families  
27 profit-making. Peter Schweizer, in his book, *Throw Them All Out*,  
28 documented how Pelosi and her husband have gained insider status and made

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millions betting on companies that were directly involved in pending legislation.

92. Plaintiffs have attempted hundreds of “proper procedure” efforts to resolve this matter in writing but government officials either: 1.) Stonewall any response, or 2.) Get fired or transferred if they investigate the matter, or 3.) Send a generic non-responsive form letter, or 4.) Finger point to another agency in an endless runaround.

93. Plaintiffs was attacked by government-financed, directed, and resourced hired attack services that had command-and-control operated by government officials.

94. The GOVT has spent over ten times more money on delaying the payment of funds to the Plaintiffs than if they had just settled with Plaintiffs in the first place. The GOVT has exacerbated the case to the point that it has gained thousands of times more media coverage than if it had just settled with Plaintiffs in the first place. The GOVT has wasted vast amounts of taxpayer money and created an international media incident when those losses could have been entirely avoided if they had just settled with Plaintiffs and been responsive to the Plaintiffs, in the first place.

95. Many government officials, up to and including the U.S. Attorney General, The Secretary of Energy, The Director of the FBI, etc., have been fired over this case and related matters, due to their attempts to manipulate government funds and resources to inure to a cartel of insiders who backed those officials’ appointments to those positions. (i.e.: The Covington & Burling files) LDLinsiders who backed those officials’ appointments to those positions. (i.e.: The Covington & Burling files) LDLinsiders who backed those

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officials' appointments to those positions. (i.e.: The Covington & Burling files)

96. Plaintiffs became a government witness and reported on crimes by government officials. In reprisal, revenge, vendetta, retaliation, and retribution, Plaintiffs have been severely harmed. The angry government officials took away the Plaintiffs QUALITY OF LIFE. Plaintiffs have lost everything which includes his house, fiancée, income, job, life savings, brand, and every source of income because of the use, by Defendants of their sophisticated spy-craft type attacks. They attacked him as reprisal/vendetta because he reported an organized crime activity involving famous U.S. Senators and their billionaire sex-addict financiers. (i.e.: for context, look up the court cases of Jeffrey Epstein, Andy Rubin, Howard Rubin, Ed Buck, and the hundreds of other related sex cult cases in the federal courts on <http://www.pacer.gov>).

97. The Plaintiffs served the public, only to have the criminals they investigated get hundreds of billions of dollars, at the expense of the Plaintiffs and public tax dollars, while Plaintiffs got nothing and lost everything.

98. It is now well documented in court records and in federal investigations that over 120 companies (listed by name, below, in the Exhibits) sell attack services ("hit-jobs") to well-known politicians.

99. The Plaintiffs investigators have proven that kill services (like Gawker-Gizmodo, Black Cube, Fusion GPS, etc.) were hired by public officials and aimed at one the victims because of their effective law enforcement cases. Police records prove that the arrested and/or charged financiers of these public officials (i.e.: Howard Rubin, Ed Buck, Roger Boas, Jeffrey Epstein,

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1 Joe Lonsdale, Eric Schmidt, Andy Rubin, Sergy Brin, Steve Bing, Michael  
2 Goguen, Forrest Hayes, Tom Perkins, etc.) ran a national executives-only sex  
3 cult in which some victims were murdered, and many were underage. The  
4 depth of their sick depravity proves that the perpetrators will stoop to any  
5 crime, using the highest levels of government resources, to cover-up their  
6 crimes. Plaintiffs helped investigate some of these perverted perpetrators and  
7 has had government agencies deployed to attack him in reprisal, retribution,  
8 retaliation efforts as payback. The FBI has the full capacity and resources to  
9 easily confirm this via an interview and investigation of the Defendants hired  
10 attackers, specifically Nicholas Guido Denton, John Herrman, Gabriel  
11 Darbyshire, Patrick George, Jay Carney, Robert Gibbs, Adrian Covert, John  
12 Cook, Elon Musk, and those other parties listed herein, and, in fact, may have  
13 already done so. The FBI will be subpoenaed in this matter.  
14

15  
16 100. Plaintiffs investigators have proven that kill services (like Gawker-  
17 Gizmodo, Black Cube, Fusion GPS, etc.) were hired by public officials and  
18 aimed at one the victims because of their effective law enforcement cases.  
19 Police records prove that the arrested and/or charged financiers of these  
20 public officials (i.e.: Howard Rubin, Ed Buck, Roger Boas, Jeffrey Epstein,  
21 Joe Lonsdale, Eric Schmidt, Andy Rubin, Sergy Brin, Steve Bing, Michael  
22 Goguen, Forrest Hayes, Tom Perkins, etc. were responsible for running a  
23 national executives-only sex cult in which some victims were murdered, and  
24 many were underage. The depth of their sick depravity proves that the  
25 perpetrators will stoop to any crime, using the highest levels of government  
26 resources, to cover up their crimes. Plaintiffs helped investigate some of these  
27 perverted perpetrators and has had government agencies deployed to attack  
28

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1 him in reprisal, retribution, retaliation efforts as payback. The FBI has the full  
2 capacity and resources to easily confirm this via an interview and  
3 investigation of the Defendants hired attackers, specifically Nicholas Guido  
4 Denton, John Herman, Gabriel Darbyshire, Patrick George, Jay Carney,  
5 Robert Gibbs, Adrian Covert, John Cook, Elon Musk, and those other parties  
6 listed herein, and, in fact, may have already done so. The FBI will be  
7 subpoenaed in this matter.  
8

9 101. The Silicon Valley tech oligarchs from Tesla, Google, Facebook,  
10 Kleiner Perkins, etc., manage a large part of these crimes. For example, one  
11 applicant's Senators have made many tens of millions of dollars in profits  
12 and bribes off (hidden in real estate (i.e.: [https://www.wsj.com/articles/big-](https://www.wsj.com/articles/big-tech-companies-amass-property-holdings-during-covid19-pandemic-11632821401..)  
13 [tech-companies-amass-property-holdings-during-covid19-pandemic-](https://www.wsj.com/articles/big-tech-companies-amass-property-holdings-during-covid19-pandemic-11632821401..)  
14 [11632821401..](https://www.wsj.com/articles/big-tech-companies-amass-property-holdings-during-covid19-pandemic-11632821401..)  
15

16 102. Plaintiffs was specifically and illegally excluded from participation in  
17 funding, benefits, jobs, and income by major political figures, including U.S.  
18 Senators and White House executives who he knew personally, and their  
19 Silicon Valley oligarch financiers. They attacked him as reprisal because he  
20 would not cooperate with their sex trafficking, tax evasion, off-shore money  
21 laundering, political bribery quid-pro-quo, revolving door payola frauds,  
22 foreign nation-sponsored domestic manipulations, stock market rigging,  
23 internet censorship, and search engine manipulation, and other crimes.  
24

25 103. The perpetrators attacked the Plaintiffs in retaliation because they  
26 reported their crimes to federal police. They attacked him as revenge because  
27 his products obsoleted their products. They attacked him using taxpayer-  
28 funded state resources. That is a felony violation of the law. The ongoing

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cover-up of these crimes and attacks is also a felony violation of the law.

Plaintiffs are owed damages compensation, witness fees, and back-pay.

104. In 1988 The Federal Office of Personnel Management ranked this victim, known herein as Plaintiffs”, with a top eighty-five percentile ranking as a Criminal Investigator in the 1811-C nationals when he was being solicited by the government for cross-border casework as a Federal Criminal Investigator (See OPM documents, attached). In other words, he placed top-in-the-nation when the government assessed his criminal investigation skills. His father, an electronics signals intelligence analyst specialist with the U.S. Army and grandfather, a U.S. Air Force Colonel had both been federal intelligence specialists in a portion of their careers. By 1988, Plaintiffs had already been working on organized crime and corruption matters since 1978. His white-collar and corruption cases were under-cover and sting operations and were side projects keyed off his public work as a private sector management and technology specialist for corporations and community programs.

105. The Plaintiffs attended many social affairs with some of the politicians. Many of the events were in public but some were in Plaintiffs private home. Some of those figures informed Plaintiffs of their organized crime scheme, the participants, and the operators. They invited Plaintiffs to become part of their scheme

106. As a White House and City Hall commended Federal patent-awarded inventor/CEO, Plaintiffs have been government, and network newscast, documented as the first to invent, launch, operate, and deliver the companies and technology that Google, Facebook

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107. Plaintiffs have been covertly reporting to GAO, FBI, FTC, SEC, FEC, IG OSC, California Fair Political Practices officials and Senators and others for decades

108. Plaintiffs cases included notorious subjects that most people have seen in the news headlines. Lately, by partnering with the messaging, media outreach, investigations and demands of <https://socialsecurityworks.org>, <https://seniorsleague.org>

109. AARP, ICIJ, and other related organizations, and using Streisand Effect amplifiers, torrents and mass social media processing, the Plaintiffs, and his peers were able to get the heads of the Social Security Administration, the heads of The U.S. Government and the Attorney General fired from their jobs for corruption and abuse of public funds.

110. Due to the effectiveness of the Plaintiffs associate's anti-corruption efforts, public officials have engaged in reprisal/retaliation attacks on the Plaintiffs and those officials engaged in felonies by doing that.

111. In the Solyndra/Silicon Valley Cartel matter, Plaintiffs did "too good a job" and broke up one of the largest corruption matters in America with roots that ran all the way to the Oval Office. The FBI raid on Solyndra was only the beginning. Energy and Media Industry crimes like these have a SIX TRILLION DOLLAR upside if the crooks can pull them off.

112. The United States Congress had awarded Plaintiffs, and his team, a commendation, and a multi-million-dollar federal contract to build America's energy "back-up" plan should the Middle East oil interests 'go sideways,' as they, indeed, have.



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113. Plaintiffs and his engineering team, as early as 2005, had informed the Department of Energy, in writing that, as Lithium-ion batteries age, the ‘dendrite defects’ in their internal chemistry cause the batteries to constantly increase their tendency to blow up. This was proven via x-ray analysis of lithium-ion batteries, particularly those from Panasonic that are used by Tesla Motors. This data was intentionally covered up by White House and Department of Energy executives because they wanted those “trillions” of dollars of profits in their pockets from the fabled Afghanistan mining fields

114. External forces, moisture, ambient energy waves and other factors, increase their tendency to self-ignite. Department of Energy Secretaries of Energy, their staff, White House, and CIA executives have been proven, via their public stock brokerage records, to own lithium-ion battery companies and child labor rare earth mining interests.

115. That is why they cover up the dangers of toxic lithium ion (the burning smoke of which causes cancer, brain, and fetus damage) and sabotage domestic efforts to market competing energy storage like fuel cells, ultra-capacitors, alkali metal-chlorine batteries, in-car batteries, beta-voltaic batteries, tritium batteries and competing alternative energy storage: in violation of anti-trust laws

116. The Secretary of Energy Jennifer Granholm’s Proterra Buses is now blowing up, Tesla is known for blowing up, Bolt and Volt cars are now blowing up and under massive recall. Ener1 batteries destroyed millions of dollars of Fisker’s when they got wet... The U.S. Government has hundreds of reports proving this to be a fact

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117. The victim has, for years, filed all the proper forms, gone “through proper channels” and inquired as to next steps from officials at the highest levels. For his efforts he has been rewarded with cover-ups, lies, obfuscation, stonewalling and avoidance. The victim now has one of America’s largest collections of “Finger-Pointing” letters from government agencies and officials, each correspondence, essentially, saying: “Oh, it’s not us go try DOJ or... (FBI, SEC, GAO. ....” No government body will step up to resolve the issue or allow their IG to investigate or let “302 reports” be written for interviews that never happen. It is the RUN-AROUND on an epic scale

118. Today, on the other hand, Plaintiffs, has had every source of income (See reprisal attack details, below) blockaded by the government as reprisal for whistleblowing.

119. Ninety percent of the public officials with authority own stock market assets in, or are financed by, Plaintiffs competitors. Workers at government agencies serving Plaintiffs have been exposed as extreme ANTIFA-type biased activists in their leaked emails, social media postings, web photos, and recorded conversations.

120. Plaintiffs are a claimant making claims for witness fees, informant fees, rewards, whistle-blower fees, legal fees, and damages caused by this matter.

121. Plaintiffs demands legal counsel be provided by your office, for the claimant, because his rights to fair legal representation, his civil rights, and Constitutional rights have been blockaded by these reprisal attacks, in violation of the law.

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122. Plaintiffs have asked for a grant. After being previously awarded a multi-million dollar valued, fully executed contract in 2005; On or about November 10, 2008, Plaintiffs at the request of U.S. Senators and Department of Energy officials applied for a \$40 million ATVM loan to build a scalable, innovative, and efficient electric car for government agencies including the Pentagon. The GOVT's own Sandia National Laboratory ("Sandia") was identified as a project subcontractor.

123. This application was in response to a GOVT solicitation. GOVT was supposed to evaluate loan applications on a "first-in, first-out" basis and to make ATVM loan funds available in January 2009 for successful applicants.

124. Plaintiffs car design used advanced "hot-swap cartridges" to provide a nearly unlimited range, cost less than \$20,000 in the base configuration, required no gasoline or extension cords to charge, required no garage, could be used by apartment dwellers, was easy to repair and build, and used "damp down" crash effect reduction materials.

125. Plaintiffs had operations in Detroit, the Midwest, and the San Francisco Bay area. A critical Plaintiffs innovation, based on a decade of research, was the use of next-generation polymer plastics in the automotive body. By replacing metal doors, body panels, hoods, and roofs with lightweight polymer plastics on a carbon fiber frame and lightweight alloy chassis, Plaintiffs build a four-seat, SUV-format vehicle with a curb weight of less than 1,400 pounds, or approximately one-third the weight of a Toyota Prius. This, in turn, enhanced vehicle efficiency and performance.

126. PLAINTIFF's pressure membrane technology was well proven and widely used in a variety of applications, including zodiac (inflatable) boats

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1 used in leisure, commercial and military applications, airbags, Mars landing  
2 equipment, and even buildings and arenas with polymer membrane  
3 coverings.

4 127. Plaintiffs car's key parts were built and evaluated, or already existed  
5 in off-the-shelf components proven in the industry for over a decade.  
6 Autodesk and other engineering software allowed for full virtual prototyping  
7 and operational testing of the design

8 128. Plaintiffs products were the top of the line for their precision and  
9 design. For consideration of Plaintiffs ATVM loan application, Defendants  
10 promised to protect Plaintiffs technical and business. The DEFENDANT  
11 used the products and information of the Plaintiffs without his permission or  
12 consent  
13

14 129. Plaintiffs financial and technical partners included Ranson Green  
15 Community Development Foundation (a 501(c)(3) nonprofit), ZAP and  
16 Detroit Electric, major automobile manufacturers and national laboratories.  
17

18 130. Plaintiffs offered GOVT asset collateral of over \$100 million to  
19 secure the ATVM loan.

20 131. Plaintiffs loan application revealed sensitive and confidential  
21 technical and business information as defined by 10 CFR §§ 1004.10(b)(4),  
22 11 and 5 U.S.C. § 552(b)(4) to GOVT. This information included fuel cell  
23 and hydrogen storage technologies, fuel cassettes, and pressure membrane  
24 body parts.  
25

26 132. Plaintiffs also disclosed his issued patents for a solid-state energy  
27 storage system and an electric and hybrid vehicle system with an estimated  
28 3rd party appraised value of \$17,291,568.64; another U.S. Patent with an

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estimated 3rd party appraised value of \$10,524,792.26; another U.S. Patent with an estimated 3rd party appraised value of \$5,607,695.94; another U.S. Patent with an estimated 3rd party appraised value of \$104,072,538.36; and other trade secrets, trademark, and intellectual property assets. These IP assets were offered as collateral to GOVT.

133. In consideration of Plaintiffs ATVM loan application, Defendants promised to protect Plaintiffs technical and business secrets and not to infringe its patents. and requesting certain additional information. **See Exhibits** where Plaintiffs provided this information and <http://www.uspto.gov>

134. On December 31, 2008, Seward informed Plaintiffs that its application was complete and that GOVT would advise Plaintiffs if it needed additional information during the application review process. **See Exhibits.** Upon information and belief, Plaintiffs ATVM loan application was the first to be deemed complete.

107. Always relevant, Plaintiffs qualified for the ATVM loan under GOVT's published underwriting criteria. For example:

Plaintiffs was an "automobile manufacturer" that demonstrated "improved fuel economy" as defined at 10 C.F.R. § 611.100(a)(1).

- o Plaintiffs was "financially viable" as defined at 10 C.F.R. § 611.100(a)(2).

- o Plaintiffs application satisfied all GOVT's requirements under 10 C.F.R. § 611.101 et seq.

- o Plaintiffs product satisfied all GOVT's evaluation criteria under 10 C.F.R. §611.103(b). Among other things, Plaintiffs car used no gasoline and traveled over 125 miles on a single charge.

- o Plaintiffs met all GOVT's environmental requirements under 10 C.F.R. § 611.106 et seq.

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1 o Plaintiffs was a “covered firm” as defined by GOVT at 10 C.F.R. § 611.207(a), and eligible for  
2 the set aside specified at 10 C.F.R. § 611.207(b).

3 o GOVT internal staff Excel comparison matrices placed Plaintiffs in the top 5% in overall  
4 comparison metrics of all applicants.

5 108. GOVT began processing Plaintiffs ATVM loan application in or about January 2009. This  
6 process should have taken no more than several weeks.

7 109. However, GOVT did not promptly underwrite Plaintiffs application.

8 110. Plaintiffs was unaware that Defendants had “fixed” the ATVM loan process to benefit political  
9 donors. Plaintiffs also was unaware that Defendants had no intention of approving Plaintiffs ATVM  
10 loan application under any circumstances as a matter of reprisal for whistle-blowing and unfair  
11 business practices to avoid competition against Tesla and other Congressional stock holdings.  
12

13 111. Therefore, Plaintiffs repeatedly contacted GOVT to provide engineering, financial and other  
14 information in support of its application.

15 112. On April 23, 2009, Jason Gerbsman, the Chief of Staff and Senior Investment Officer, at the  
16 Loan Programs Office, Automotive Division, of GOVT, notified Plaintiffs that: Plaintiffs have  
17 submitted a complete application and has been assigned to both a technical eligibility and merit  
18 review team, as well as a financial viability analysis team. The technical team is close to finishing  
19 their evaluations on both eligibility and project merit, and the financial team will be launching a  
20 more detailed and interactive due diligence phase of the Plaintiffs application review very soon.  
21 Following the technical and financial evaluation under the second stage of the process, we will  
22 move into the underwriting phase where our goal is to negotiate a conditional commitment,  
23 including a detailed term sheet. This will be followed by the fourth phase of the loan process where  
24 the final details will be negotiated, and the loan will be close  
25

26 113. On May 26, 2009, Gerbsman offered an in-person meeting to discuss “Plaintiffs next steps.”  
27  
28

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1 114. On May 28, 2009, Plaintiffs flew a delegation from California to meet with Gerbsman, who  
2 said that GOVT had determined “everything was in order” with Plaintiffs ATVM loan application,  
3 that “everything looked good” and that Plaintiffs “appeared to be fully compliant and passed  
4 technical review.”

5 115. Shortly thereafter, Plaintiffs discovered that Tesla Motors, Inc. (“Tesla”) and Fisker Motors,  
6 Inc. (“Fisker”) had received and were receiving special assistance from GOVT staff with the  
7 ATVM loan application process. Fisker even had a business office in GOVT’s headquarters.  
8

9 116. On or about June 22, 2009, GOVT advised Plaintiffs that a Northern California solar energy  
10 company had requested a copy of Plaintiffs ATVM loan application from GOVT through the  
11 Freedom of Information Act (“FOIA”). Plaintiffs contacted this company to see why it was  
12 interested in Plaintiffs ATVM loan.

13 117. Plaintiffs spoke with the company’s principal, who said that he had been “screwed over” by  
14 GOVT and wanted to know if others had a similar experience. He said that the company had  
15 suffered “bad dealings” with Matt Rogers, a “stimulus advisor” to the Chu from McKinsey &  
16 Company, and Steven Spinner, a key player in GOVT’s loan program office. Spinner, an Obama  
17 campaign bundler who raised millions for the President and who had been appointed to his  
18 government position in exchange for his fundraising, also had worked at McKinsey & Company  
19 and, according to his biography posted by the Center for American Progress, had served as an active  
20 advisor and investor to Tesla.  
21

22 118. Plaintiffs was told that Rogers and Spinner were “rigging the game.” It was given Spinner’s  
23 phone number and told to call Spinner and ask him why Plaintiffs ATVM loan application was not  
24 moving forward.  
25

26 119. Plaintiffs texted Spinner and then called him. Spinner answered the phone and told Plaintiffs  
27 words to the effect of “Do not ever call me again. The awards have already been decided.”  
28



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1 120. On June 24, 2009, GOVT announced \$8 billion in ATVM loans to Ford Motor Company  
2 (“Ford”), Nissan North America, Inc. (“Nissan”) and Tesla. Tesla was the Plaintiffs competitor --  
3 received an ATVM loan of \$465 million at a rate of 1.6% from GOVT to manufacture an expensive  
4 electric car.

5 121. On June 29, 2009, Plaintiffs wrote to Gerbsman again asking for action on its ATVM loan  
6 application, pointing out that other lenders were hanging back until after GOVT issued its term  
7 sheets, the offering document issued by GOVT that specifies the detailed terms and conditions  
8 under which GOVT may enter a Conditional Commitment with the Applicant.  
9

10 122. In the following weeks, authorized GOVT representatives repeatedly assured Plaintiffs that  
11 “everything was fine”, “everything is on-track”, and “you [WITNESS] appear to meet every  
12 criterion” with respect to an ATVM loan. Plaintiffs was even told that “we [GOVT] should be able  
13 to announce [an approved ATVM loan] any day now...”

14 123. However, on August 21, 2009, Seward denied Plaintiffs ATVM loan application. **See Exhibit**

15 124. In an email to GOVT’s Chris Foster, Plaintiffs requested GOVT’s merit review documents and  
16 asked how GOVT technical evaluators could conduct a ten-month comparative merit review of  
17 Plaintiffs ATVM loan application without speaking to any single company engineer or senior  
18 project staff member for more than 1% of the time that GOVT staff addressed Tesla, Nissan Ford,  
19 and Fisker during the same review period.  
20

21 125. On or about August 26, 2009, Plaintiffs called Foster. Foster said GOVT had denied the  
22 application because Foster said Plaintiffs “electric car did not use E85 gasoline, Plaintiffs was not  
23 planning on building “enough” cars, Plaintiffs was not planning on selling cars to the government,  
24 Plaintiffs electric motors t and batteries were too futuristic and not developed for commercial use,  
25 Plaintiffs car was a “hydrogen car,” and Plaintiffs had underestimated the cost of metal body  
26 fabrication.”  
27

28 126. The reason given for the denial of the loan was based on false pretense.

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1 127. These “reasons” were baseless pretexts to protect Tesla, and other insider stock holdings, that  
2 U.S. Senators and DOE executives held.

3 o None of the Plaintiffs competitors that were given ATVM loans to build electric cars used E85  
4 gasoline in their vehicles.

5 o Plaintiffs car was designed to be easily scalable, using “off the shelf” parts from existing  
6 commercial sources with multiple points of supply.

7 o Plaintiffs business plan specifically provided for large government and fleet sales. Plaintiffs  
8 “futuristic” electric motor and battery configuration had been in commercial and government use  
9 for decades.

10 o Plaintiffs car was an electric car, not a hydrogen car.

11 o Plaintiffs scar body contained minimal amounts of metal, using safer and easier to source and  
12 fabricate polymers and plastics.

13 128. Foster never provided Plaintiffs with GOVT’s merit review documents or described the  
14 applicable evaluation criteria. On September 21, 2009, Plaintiffs wrote to the Chu requesting  
15 reconsideration of GOVT’s ATVM loan denial. See Exhibit s.

16 129. Plaintiffs demonstrated that the stated reasons for GOVT’s denial were false. It asked Chu to  
17 explain why GOVT staff repeatedly assured Plaintiffs that approval would be forthcoming and that  
18 no additional information was necessary (leading Plaintiffs and its principals to expend huge sums  
19 of money in reliance thereon), and why government-crony companies that applied after Plaintiffs  
20 were reviewed earlier, given the benefit of extensive access to and interaction with GOVT staff (a  
21 benefit denied to Plaintiffs), and then awarded funds.

22 130. On October 23, 2009, Seward replied to Plaintiffs. **See Exhibit 5.** He did not answer Plaintiffs  
23 questions. Instead, he backfilled with new but equally baseless reasons for Plaintiffs rejection.  
24  
25  
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28

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1 131. The reason given for the denial was unreasonable. To begin with, Seward said that Plaintiffs  
2 application was “deemed Substantially Complete on November 10, 2009.” In fact, Plaintiffs  
3 application had been deemed complete on December 31, 2008.

4 132. Seward said that the “proposed technology appeared to be at a development stage and not yet  
5 ready for commercialization” and that the “assumption that the vehicle concept would be ready for  
6 production in three years” was a “significant weakness” due to the “high level of risk associated  
7 with the design.” In fact, the Plaintiffs vehicle’s technology had been in use commercially for years  
8 by the U.S. Department of Defense, NASA, and the automobile industry; the politically connected  
9 companies that were awarded ATVM loan funds were no further ahead in production than  
10 Plaintiffs, and elements of Plaintiffs “elevated risk design” were already in use by Toyota and  
11 Nissan.  
12

13 133. The second reason given by Steward was baseless. Seward said, “the proposed project’s  
14 impact on fuel economy...was determined to be weak.” In fact, non-gasoline-powered automobiles  
15 are uniformly recognized to offer the most significant impact on fuel economy performance. The  
16 Plaintiffs vehicle promised even better fuel economy than any of the ATVM loan “winners” (Tesla,  
17 Nissan, Ford or Fisker) proposed or offers to this day.  
18

19 134. The third reason given by Steward was groundless. Seward said, “A review of the advanced  
20 fuels in your project and the feasibility of that energy source...was [sic] questionable.” In fact, the  
21 fuels, products, and subparts of the “questionable” energy source are readily available to consumers  
22 at REI Sporting Goods, Amazon.com and Safeway supermarkets.  
23

24 135. The fourth justification given by Steward for the denial was it was unrealistic. Seward said, “A  
25 review of the calculations and assumptions supporting your claims for reductions in petroleum use  
26 were deemed to be unrealistic.” In fact, over two hundred institutional research and white papers  
27 from respected government and university agencies from around the world supported Plaintiffs  
28 claimed reductions.

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1 136. Seward's letter was the first time any of these issues had been raised by GOVT with the  
2 Plaintiffs, notwithstanding ten months of "underwriting," and multiple meetings, phone calls, and  
3 emails. Incomprehensibly, GOVT had refused to consult with any of Plaintiffs engineers and denied  
4 Plaintiffs the "interactive" review that had been promised in April and had in fact been provided to  
5 Tesla, Fisker, Nissan, and Ford.

6 137. DEFENDANTS did not review Plaintiffs ATVM loan application in good faith and in  
7 accordance with its regulations, policies, and promises. Instead, it stonewalled Plaintiffs.  
8

9 138. Each application that the Plaintiffs presented was denied.

10 139. Or about February 1, 2009, Plaintiffs (through Limnia) applied for a \$15 million ATVM loan  
11 to help fund work with GOVT's own Sandia National Laboratories ("Sandia") to produce a "best of  
12 breed and state of the art" automobile energy storage system using Plaintiffs patented fuel cell  
13 technology.

14 140. On April 10, 2009, Seward denied this application on the grounds that it "[did] not appear to  
15 be designed for installation in an advanced technology vehicle..." **See Exhibit 6.** At all times  
16 relevant, DEFENDANT knew Seward's claim was false and a mere pretext to preserve ATVM loan  
17 funds for government-favored companies.  
18

19 141. On April 11, 2009, Plaintiffs requested reconsideration, reminding Seward that the relevant  
20 patents provided the technology was for use in advanced technology vehicles, that Sandia's vehicle  
21 technologies group was the prime subcontractor for the project, and that GOVT had funded the  
22 technology specifically for use in advanced technology vehicles. **See Exhibit s.**  
23

24 135. GOVT had funded the technology specifically for use in advanced technology vehicles. **See**  
25 **Exhibits.**

26 142. On May 13, 2009, Seward again denied the application because the technology was "not  
27 installed in the advanced technology vehicle." This time, though, he asked for more information.  
28

**See Exhibits.**

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1 143. On June 3, 2009, Plaintiffs again requested reconsideration, pointing out that the device “must  
2 be installed prior to use in an advanced technology vehicle and are, accordingly, designed for such  
3 installation, and therefore... ‘qualifying components’” and answering Seward’s other questions. **See**  
4 **Exhibits.**

5 144. On or about February 1, 2009, Plaintiffs participated in a conference call with John Podesta,  
6 Chu, and Interior Secretary Kenneth Salazar during which Chu promised to waive the application  
7 fee.  
8

9 145. On or about February 10, 2009, Plaintiffs (through Limnia) filed a LGP application with a  
10 cover letter stating that it was Plaintiffs understanding that GOVT had waived the application fee.

11 146. On February 26, 2009, GOVT’s Myrtle Gross called and said that the application fee of  
12 \$18,000 had to be paid and that funds needed to be wired by midnight for the LGP application to be  
13 considered. This was Plaintiffs first notice from GOVT that the agency had reneged on its promise  
14 to waive the LGP application fee.  
15

16 147. Plaintiffs had access to the funds to make payment but could not complete the transaction by  
17 the midnight deadline.

18 148. On February 27, 2009, Daniel Tobin, GOVT’s Loan Programs Office Senior Investment  
19 Officer, called and said that there were “a few days of flexibility” to send in the application fee and  
20 promised to provide wire instructions.

21 149. Tobin also promised to “pre-review” the application and to call back with feedback. The  
22 Plaintiffs never heard back from Tobin or anyone else at GOVT. WITNESS repeatedly contacted  
23 Tobin by email, phone call and messenger, but neither he nor anyone else at GOVT would respond  
24 or provide wire instructions.  
25

26 150. Instead, on April 9, 2009, Tobin dismissed Plaintiffs from the LGP without recourse, writing  
27 Plaintiffs that “due to non-remittance of the required application fee, your application will not be  
28 reviewed.” **See Exhibit**

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1 151. GOVT ignored Plaintiffs request for reconsideration.

2 152. The Defendants did not use the loan program for the intended use. Instead, the loan program  
3 was done by a selection process that intentionally eliminate all those viable candidates for a loan  
4 such as a Plaintiffs.

5 153. GOVT's ATVM loan program and LGP were not transparent, and GOVT's underwriting  
6 criteria were easily skewed and manipulated by political officials, these programs became cash  
7 cows for government cronies.

8  
9 154. Plaintiffs discovered in or about the end of Dec. 2008 that Seward angered at Plaintiffs public  
10 complaints about GOVT's ATVM loan and LGP administration told his staff in 2009 that it would  
11 be "a cold day in hell before I let [Plaintiffs] get any money." Seward used his power to exclude  
12 ATVM loan PLAINTIF's arbitrarily, intentionally, and wrongly and LGP applications.

13 155. In February 2011, GAO issued an investigative report on GOVT's ATVM program. See  
14 Exhibit s "Advanced Technology Vehicle Loan Program Implementation Is Under Way, but  
15 Enhanced Technical Oversight and Performance Measures Are Needed," GAO-11-145 (Feb 28,  
16 2011) (the "GAO ATVM Loan Report"). It found that GOVT had made billions in loans without  
17 engaging "engineering expertise needed for technical oversight.... As a result, GOVT cannot be  
18 assured that the projects will be delivered as agreed. [Furthermore], GOVT has not developed  
19 sufficient performance measures that would enable it to fully assess the extent to which it has  
20 achieved its...program goals."

21  
22 156. In truth, GOVT's ATVM loan program was nothing more than a veil for political officials to  
23 steer hundreds of millions of taxpayer dollars to government cronies, including Tesla and Fisker.

24 157. For example, Tesla's loan of \$465 million was announced on June 24, 2009. This loan was  
25 obtained in material part through the efforts and influence of Steven Westly who had "bundled"  
26 hundreds of thousands of dollars in political contributions. Westly sat on Tesla's board from March  
27 2007 to December 2009, the time in which GOVT made the ATVM loan.  
28

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1 158. In consideration for his financial contributions, Westly was given unusual Executive Branch  
2 access privileges and an appointment on a key advisory board counseling Chu. This allowed Westly  
3 to help shape GOVT policy to advance his personal business interests.

4 159. GOVT's Spinner, who played a key role in the ATVM loan program, was also a political  
5 "bundler," and a former Tesla investor and advisor. Additionally, Tesla's founder and CEO also  
6 made large political contributions to Democrats, including President Obama, in or about 2008.

7 160. On November 12, 2012, Tesla notified the Securities and Exchange Commission that: On  
8 January 20, 2010, we entered a loan facility with the Federal Financing Bank (FFB), and The U.S.  
9 Government (GOVT), pursuant to the Advanced Technology Vehicles Manufacturing (ATVM)  
10 Incentive Program. This loan facility was amended in June 2011 to expand our cash investment  
11 options, in February 2012 to modify the timing of certain future financial covenants and funding of  
12 the debt service reserve account, and in June 2012 to allow us to effect certain initiatives in our  
13 business plan. We entered another amendment with the GOVT in September 2012 to remove our  
14 obligation to comply with the current ratio financial covenant as of September 30, 2012 and amend  
15 the timing of pre-funding the principal payment due in June 2013. Under the GOVT Loan Facility,  
16 the FFB has made available to us two multi-draw term loan facilities in an aggregate principal  
17 amount of up to \$465.0 million. Up to an aggregate principal amount of \$101.2 million had been  
18 made available under the first term loan facility to finance up to 80% of the costs eligible for  
19 funding for the powertrain engineering and the build out of a facility to design and manufacture  
20 lithium-ion battery packs, electric motors, and electric components (the Powertrain Facility). Up to  
21 an aggregate principal amount of \$363.9 million has been made available under the second term  
22 loan facility to finance up to 80% of the costs eligible for funding for the development of, and to  
23 build out the manufacturing facility for, our Model S sedan (the Model S Facility). Under the  
24 GOVT Loan Facility, we are responsible for the remaining 20% of the costs eligible for funding  
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1 under the ATVM Program for the projects as well as any cost overruns for each project. As of  
2 August 31, 2012, we have fully drawn down the facilities.

3 161. Also on November 12, 2012, with \$465 million of taxpayer money spent, Tesla reported  
4 delivering a grand total of 256 vehicles for sale to customers.

5 162. Fisker's ATVM loan of \$528.7 million was announced on September 22, 2009, a month after  
6 Seward rejected Plaintiffs application for a \$40 million ATVM loan.

7 163. This loan was obtained in material part through the efforts and influence of John Doerr, a  
8 major political contributor and government crony. At all times relevant, Doerr was a partner in the  
9 investment firm of Kleiner, Perkins, Caufield & Byers, along with former Vice President Al Gore,  
10 among others.

11 164. Kleiner, Perkins was a major Fisker investor. Doerr and his partners donated millions to the  
12 2008 Obama campaign and related political causes, obtaining in exchange preferential access and  
13 treatment for their business interests. Among other things, Doerr's political contributions produced  
14 high-level Executive Branch access and a seat on the President's Council on Jobs and  
15 Competitiveness.  
16

17 165. When GOVT announced Fisker's half-a-billion-dollar loan facility, it claimed that Fisker's  
18 ATVM loan would "create or save about 5,000 jobs for domestic parts suppliers" by funding "two  
19 lines of plug-in hybrids." Approximately \$169.3 million of taxpayer funds were for "engineering  
20 integration" need for final assembly of a high-cost electric luxury car in Finland. Approximately  
21 \$359 million of taxpayer funds was for manufacturing a low. cost plug-in hybrid sedan in the U.S.  
22 through "Project Kx." See Exhibit Conditional Commitment Letter by and between United States  
23 Department of Energy and Fisker Automotive, Inc. – Execution Copy (September 18, 2009).  
24

25 166. When GOVT approved Fisker's loan, the Project Kx car did not exist, not even in prototype.  
26 Upon information and belief, GOVT lacked even detailed engineering and production specifications  
27 for the car. Nevertheless, Defendants parroted Fisker's claim that "up to 75,000-100,000 [Project  
28

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1 Kx] vehicles will roll off assembly lines in the U.S. every year beginning in late 2012” to justify the  
2 Kx loan.

3 167. In 2011, Fisker promised that the Kx vehicle, which had yet to be publicly show, would be in  
4 mass production by the end of 2012.

5 168. On or about 2011, Fisker promised that the Kx vehicle, which had yet to be publicly show,  
6 would be in mass production by the end of 2012.

7 169. On or about February 2012, after Fisker had borrowed over \$170 million, GOVT froze  
8 Fisker’s ATVM loan credit facility because Fisker missed key production milestones.

9 170. On or about June 2012, Fisker finally revealed the Project Kx prototype, a “low cost” \$55,000  
10 auto called the “Atlantic.”

11 171. On or about October 18, 2012, Fisker reported that Atlantic production would be delayed until  
12 2014 or 2015.

13 172. Since 2008, Fisker has sold approximately 1,500 vehicles world-wide.

14 173. Upon information and belief, the over \$170 million in taxpayer money GOVT has given to  
15 Fisker has “saved or created” fifty or fewer jobs.

16 174. In March 2012, and in response to complaints by Plaintiffs and others, GAO issued an  
17 investigative report on GOVT’s LGP performance. See Exhibit s “GOVT Loan Guarantees: Further  
18 Actions Needed to Improve Tracking and Review of Applications,” GAO-12-157 (March 2012).  
19 GAO found that GOVT treated LGP applicants inconsistently, favoring some and disadvantaging  
20 others; lacked systematic mechanisms for LGP applicants to administratively appeal its decisions;  
21 often ignored its own underwriting standards and skipping review steps; and re-reviewed rejected  
22 applications on an ad hoc basis. In fact, GOVT’s “Omitting or poorly documenting reviews reduces  
23 LGP’s assurance that it has treated applicants fairly and equitably.”

24 175. In October 2012, emails were released confirming that at least a number of LGP decisions  
25 were based on political factors not GOVT’s stated evaluation criteria. See e.g., Exhibit s (Email  
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1 from Jonathan Silver, former Executive Director, GOVT Loan Programs Office, to James C.  
2 McCrea, GOVT LPO credit adviser, dated June 25, 2010, stating “WH wants to move Abound  
3 [project] forward. Policy will have to wait...”); Exhibits (Email from James C. McCrea to B.  
4 Oakley stating “Pressure is on real heavy...due to interest from VP”); Exhibit s (Email from  
5 Monique Fridell to Kimberly Heimert, et al. dated May 25, 2010, stating “GOVT has made a  
6 political commitment to get Unistar through the approval  
7  
8 176. The process was by 6/15”; Exhibit 17 (Email from James C. McCrea to Monique Fridell dated  
9 June 1, 2010, stating “Secretary [of Energy] ...is adamant that this transaction is going to OMB by  
10 the end of the day Fri if not sooner. Not a way to do things but a direct order”)  
11  
12 177. OVT bent the rules for political allies such as Sen. Harry Reid and Rep. Steny Hoyer, while  
13 government crony companies received special personal access to high-ranking GOVT officials. See  
14 e.g., Exhibit s (Email from James C. McCrea to “barbiar” dated December 5, 2009, stating “[Harry]  
15 Reid may be desperate. WH may want to help. Short term considerations may be more important  
16 than long term considerations and what is a billion anyhow?”); Exhibit s (Email from James C.  
17 McCrea to Julie Stewart dated May 25, 2010, stating “7th Floor has decided mid-June CRB...there  
18 has been a commitment from S1 [Secretary Chu] to Steny Hoyer on this. Nothing like over-  
19 committing and under-delivering;” Exhibit s (Email from BrightSource Chairman John Woolard, an  
20 LGP applicant, to Jonathan Silver, GOVT Loan Office Director dated November 10, 2010, stating  
21 “Thanks for offering to meet at your house tomorrow morning.” Silver replied “Came [sic] anytime.  
22 Guest bedroom is ready.”). Defendants regularly slept with each other and at each other’s homes.  
23

**ADDITIONAL NOTES ON DEFENDANT’S OVERALL CORRUPT CRONY****ABUSE OF AND HARM TO Plaintiffs**

26 178. DEFENDANTS’ actions have consistently abused and caused harm to the Plaintiffs.  
27  
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1 179. When DEFENDANTS “fixed” the ATVM loan and LGP programs to benefit government  
2 cronies, they knowingly and intentionally rendered the ATVM loan and LGP applications by  
3 Plaintiffs and other similarly situated companies futile and meaningless.

4 180. DEFENDANT intentionally induced Plaintiffs and others similarly situated through multiple  
5 written and verbal representations from GOVT officials with actual and apparent authority to bind  
6 GOVT, to spend hundreds of thousands of dollars, and invest thousands of hours of engineering and  
7 professional time on a meaningless snipe hunt.

8 181. Defendants’ administration of the ATVM loan program effectively dried up all alternative  
9 sources of capital and denied Plaintiffs and others similarly situated access to private financing by  
10 delaying term sheets and/or wrongly denying ATVM loans, among other things. Defendants had  
11 actual or constructive knowledge that delaying or denying a small company’s ATVM loan  
12 application would be as a business death sentence.

13 182. DEFENDANTS’ administration of the ATVM loan program effectively dried up all  
14 alternative sources of capital and denied Plaintiffs and others similarly situated access to private  
15 financing by delaying term sheets and/or wrongly denying ATVM loans, among other things.  
16 Defendants had actual or constructive knowledge that delaying or denying a small company’s  
17 ATVM loan application would be as a business death sentence.

18 183. Chu and Seward skewed, manipulated, and fixed GOVT’s ATVM loan review process against  
19 Plaintiffs and other companies similarly situated to protect and advance the business and political  
20 interests of government cronies and caused Plaintiffs ATVM loan and LGP applications to be  
21 rejected on false bases and flimsy pretexts.

22 184. Some of the examples of the skewed and manipulated actions of the government officials are  
23 as follows:  
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- 1 a. Government cronies who applied for the ATVM loan after Plaintiffs were reviewed earlier,  
2 walked through the “underwriting” process by GOVT staff and given the benefit of unique agency  
3 interaction, and then awarded funds.
- 4 b. GOVT staff first issued over twenty documents, public statements, policy notices, PowerPoints  
5 and other materials verifying that ATVM loans would be processed on a “first-come, first-served”  
6 basis. Because crony companies did not submit applications in a timely fashion, GOVT  
7 subsequently altered this policy.
- 8 c. GOVT paid outside, unqualified technical reviewers to conduct pre-textual diligence and  
9 application reviews. Plaintiffs spoke with Carol Battershell, who stated she was the due diligence  
10 technical lead on Plaintiffs application. She said she had gotten everything she needed “off  
11 [PLAINTIF’S] website.” GOVT reviewers never talked to Plaintiffs founder, inventor, engineers,  
12 project leads or primary contractors, and refused to speak with Plaintiffs engineers, even after  
13 Plaintiffs engineers called and visited them to offer data and other information.
- 14 d. GOVT officials directed Argonne National Laboratory staff to manipulate data to favor certain  
15 applicants.
- 16 e. GOVT employees were ordered by senior GOVT and Executive Branch political officials to  
17 ignore non-favored applicants until deadlines had passed to shrink the applicant pool.
- 18 f. GOVT ignored standard commercial bank loan processes, including the use of competent  
19 engineers to conduct technical review and the consistent application of the same underwriting  
20 criteria to each loan application. Instead, the “loan review process” was intentionally manipulated,  
21 bypassed, or stalled, to ensure that funds were given to government favored “winners” but not to  
22 Plaintiffs or other companies that lacked large political contributions and special Executive Branch  
23 access.  
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- 1 g. The ATVM loan funds distribution DEFENDANTS repeatedly manipulated date to frustrate  
2 Plaintiffs and other similarly situated companies' efforts to attract private investors, thereby starving  
3 Plaintiffs of capital.
- 4 h. Political officials made review and "underwriting" decisions.
- 5 i. GOVT staff told Plaintiffs and others that GOVT was out of money and thus ATVM loan  
6 applications could not advance. However, the ATVM loan fund was never out of money and,  
7 indeed, a "carve out" of appropriated funds was "held" for government cronies who made political  
8 contributions and hired political fixers to obtain "top-tier status" and "special relationships" with  
9 GOVT.
- 10 j. GOVT eased expectations for projected car sales volume by Fisker, a favored crony company  
11 with close ties to senior political officials in the White House, after GOVT had conditionally  
12 approved an approximate \$560 million loan, and then made allowances for scaling back projections  
13 in the final loan agreement, and then renegotiated loan terms to ameliorate Fisker's cash flow crisis  
14 in the weeks before the 2012 Presidential election.
- 15 k. GOVT applied different metrics to ATVM loan applicants based on political connections and  
16 contributions.
- 17 l. GOVT promised to waive the LGP application fee. Within hours of the due date, GOVT reneged.  
18 The next day, GOVT contacted WITNESS promising to accept overdue payment. Again, GOVT  
19 reneged.
- 20 m. GOVT hid the "merit review" data, reviewer identities, reviewer work histories, and other  
21 information from Plaintiffs, all other ATVM loan applicants and the public. This information, if  
22 disclosed, would have allowed for an open and transparent loan process, and allowed Plaintiffs and  
23 others to evaluate the efficacy of GOVT's merit review.
- 24 n. GOVT willfully, intentionally, and overestimated government crony company production  
25 capabilities and sales performance to justify its approval of ATVM loans. For example, GOVT  
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1 promised that Fisker alone would have “75,000 – 100,000” ATVM loan-funded cars rolling off U.S.  
2 assembly lines. In 2012, Ford, Nissan, Fisker, and Tesla (the ATVM loan “winners”) combined sold  
3 fewer than 25,000 ATVM loan-funded vehicles nationwide.

4 o. Plaintiffs 2008 benefits application was hacked and manipulated by public officials to engage in  
5 reprisal, retribution, and revenge against Applicant for reporting about a federal crime involving  
6 public officials. The Plaintiffs have been waiting for his proper benefits payments since 2008.

7 Investigations have proven that government officials were ordered to not approve the Plaintiffs as  
8 reprisal/vendetta punishment for his testimony against public officials with access to government  
9 records operations, records, and determinations.

10 p. Most of the Plaintiffs injuries came from his contractor/employment work for the Government.

11 q. Most of the Plaintiffs injuries were never investigated by government officials in an unbiased or  
12 conclusive manner per word scans of government officials’ records.

13 r. Government officials that met with, or interacted, with Applicant concurrently, or later, ended up  
14 working for his political/business enemies and bragged about that fact in their emails, voicemails,  
15 text messages, social media postings, photo postings and other media. They were biased to harm  
16 Plaintiffs.

17 s. Government officials that met with, or interacted, with Plaintiffs concurrently, or later, ended up  
18 working for his political/business enemies and bragged about that fact in their emails, voicemails,  
19 text messages, social media postings, photo postings, and other media. They were biased toward the  
20 Plaintiffs. The communications between Administration staff and Plaintiffs and their representatives  
21 including minutes of those meetings, or any memorandum written about these meetings by  
22 Administration employees and contractors who were present has been demanded. The FBI, a third  
23 party with a fountain pen video camera and/or a cell phone, in addition to government recordings,  
24 are thought to exist for this CIVIL RIGHTS VIOLATION incident. While there have been a lot of  
25 concerns lately about efforts to misuse "wiretapping" laws that forbid any recordings of people  
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1 without their knowledge, it appears at least a few courts are recognizing how silly that is. Yet  
2 another court has now said that secretly recording a conversation -- in this case with an iPhone -- is  
3 okay, assuming there was no crime committed with the recording, and the recording was for a  
4 legitimate purpose. As the court noted: "The defendant must have the intent to use the illicit  
5 recording to commit a tort of crime beyond the act of recording itself." That makes sense. The act of  
6 recording alone, should not be a criminal act, as it really depends on what is being done with the  
7 recording. And, in an age where not only is recording everything easier, but for some becoming  
8 standard, requiring permission to record all audio seems like an outdated concept. Using an iPhone  
9 to secretly record a conversation is not a violation of the Wiretap Act if done for legitimate  
10 purposes, a federal appeals court has ruled. "The defendant must have the intent to use the illicit  
11 recording to commit a tort of crime beyond the act of recording itself," (.pdf) the 2nd U.S. Circuit  
12 Court of Appeals ruled. The decision by the 2nd U.S. Circuit Court of Appeals, which involves a  
13 civil lawsuit over a secret audio recording produced from the 99-cent Recorder app, mirrors  
14 decisions in at least three other federal appeals courts. The lawsuit concerns a family dispute over  
15 the making of a dying mother's will. Days before the Connecticut woman died, her son secretly  
16 recorded a kitchen conversation between the son, mother, stepfather, and others over how to  
17 manage her estate after her death. The son, in a probate dispute, turned over the audio file to the  
18 court in 2008 to bolster his position concerning the estate of his late mother, who died without a  
19 will. The stepfather sued him, alleging a privacy breach under the Wiretap Act. A federal judge  
20 dismissed the case, and the stepfather appealed. The appeals court ruled that, even if the son  
21 consented to his own taping, he could be sued for money damages for a breach of the Wiretap Act if  
22 and only if he did so with a nefarious intent. "We affirm, and, in so doing, hold that the exception to  
23 the one-party consent provision of 18 U.S.C. § 2511(2)(d) requires that a communication be  
24 intercepted for the purpose of a tortious or criminal act that is independent of the intentional act of  
25 recording," the New York-based federal appeals court said.

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- 1 t. The Inspector-General has supplied certified federal records of numerous vendetta/reprisal  
2 attacks by government officials against other American citizens as reprisal/vendetta acts.
- 3 u. All the U.S. Inspector General offices for ALL agencies have documented thousands of  
4 vendetta/reprisal attacks by State and Federal public officials.
- 5 v. An ongoing practice of vendetta/reprisal attacks by State and Federal public officials exists and  
6 operates within government agencies.
- 7 w. The volume and scope of vendetta/reprisal attacks by State and Federal public officials  
8 uncovered against Applicant proves that he is a “targeted whistle-blower.”
- 9 x. The hackers, by name, **(Per Exhibits and at <http://www.majestic111.com>)** have been  
10 identified by FBI, CIA, DIA, NSA and FinCEN as having hacked and having great ease to hack  
11 government servers and that some of them were employed by Applicant’s enemies including  
12 working in the political offices of public officials (particularly U.S. Senators) who competed with or  
13 were adversarial to the Plaintiffs in there, or their family business dealings.
- 14 y. Plaintiffs worked over 60 hours per week for many decades based on assurances from the  
15 government that he would receive, at least, \$1400.00 per month upon retirement but the government  
16 assurances, to HIM, were false.
- 17 z. The government only paid the Plaintiffs \$778.00 per month while Applicant’s peers receive  
18 \$3000.00 per month from the government while his ARRESTED adversaries and competitors  
19 receive over \$10,000.00 per month from the government.
- 20 aa. All government agencies represent the “United States Government,” and it is a false assertion  
21 for the agencies under the United States Government to have denied responsibility for their actions.
- 22 bb. The United States Government asked Applicant to invest his life savings in a government  
23 energy program and defrauded Applicant out of his lifesavings, years of his time and his pending  
24 profits while providing those same profits to his competitors and to his elected representatives who  
25 were financial partners and shareholders with those competitors.
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1 cc. The IRS, GOVT, and other agencies were sued in Federal Court and LOST the court hearings as  
2 they WERE found to be engaging the abuse of government offices for vendetta/reprisal attacks.  
3 Those parties were compensated but Plaintiffs have not received his compensation. There was an  
4 ongoing failure to respond to Plaintiffs requests which is damaging Plaintiffs via accruing monetary  
5 harms daily. Plaintiffs and its advocates have provided over two million pages of FBI-quality  
6 evidence, proving all the assertions herein, via hard drives and online file repositories. At no time  
7 has the government ever provided written statements disputing any of the criminal charges in this  
8 matter. The website at <http://www.majestic111.com> is an example of thousands of evidence  
9 repositories posted online about this case.  
10

11 dd. Plaintiffs have filed federal RICO charge referrals in this matter with DOJ

12 ee. By withholding and blockading Plaintiffs funds, SSA and other government agencies have  
13 prevented Plaintiffs from having access to adequate legal representation. In previously provided  
14 documents Plaintiffs advocates have provided extensive legal references and proof that such  
15 blocking of Plaintiffs legal representation via the with-holding of government funds is illegal  
16

17 ff. Plaintiffs have never received a response to his multiple SSA Form 561-U2 or 7008 filings  
18 Applicant has filed multiple letters confirming that there should be no blank years in is earnings  
19 statement and has received no responsive action from SSA on those assertions and the hundreds of  
20 work proof reference letters, videos, and press clippings he provided proving the assertions. SSA  
21 and The U.S. Government owe Plaintiffs monies for damages caused by government actions, harms,  
22 and inaction.  
23

24 gg. The Plaintiffs have provided the government with the medical records of other U.S. citizens that  
25 were sent to the Plaintiffs by the government in violation of federal HIPPA laws. The government  
26 said that the records were the Plaintiffs yet, they had other people's names, SS#s, and medical  
27 information. This is one of many evidence items that clearly prove that the Applicant's records were  
28 manipulated, confused, and mismanaged by government staff. To be clear, government officials

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1 sent the medical records of multiple other citizens to the Plaintiffs in violation of HIPPA laws and  
2 those other parties privacy rights.

3 hh. Government officials told Applicant, in meetings at the San Francisco government offices, in  
4 2007 and 2008, that he was fully qualified, with government credits. Applicant demands his funds  
5 for his damages and the back-owed monies.

6 ii. Defendants employed spy agency “dirty tricks” campaigns against Plaintiffs.

7  
8 185. The United States Government has awarded Plaintiffs dozens of issued seminal patents as  
9 first-to-invent original technologies now commercially exploited by the U.S. government and the  
10 Silicon Valley Companies who finance the White House and California Senators.

11 186. White House senior staff and California politicians own the stock market shares of the  
12 infringing companies and are politically financed by those infringers.

13 187. The United States took actions to prevent Plaintiffs from fair-market monetization of those  
14 patents. The United States blockaded Plaintiffs ability to profit from his inventions by its directives  
15 to the National Venture Capital Association, and related parties, and through communications with  
16 such NVCA bosses as Gilman Louie, James Breyer, Jeffrey Epstein, John Doer, and related  
17 persons.  
18

19  
20 188. Plaintiffs was blockaded using the tactics described at <http://www.usinventor.org> and  
21 via the use of "The Enterprise" to protect the Silicon Valley political financiers and White  
22 House stock market holders of those Big Tech political campaign financiers.

23 189. Plaintiffs demands that the United States purchase Plaintiffs Patents at reasonable value based  
24 on third party appraisals and the published prices of recent similar patents that were purchased in  
25 the intellectual property market.  
26

27 190. Plaintiffs are seeking damages for the injuries that he has suffered because of the  
28 DEFENDANT’S ACTIONS.

**ADDITIONAL CAUSES OF ACTION**

**II. BREACH OF CONTRACT**

191. The Plaintiffs repeats and re-alleges each of the foregoing allegations as though fully set forth herein.

192 Pursuant to §136 of the Energy Independence and Security Act of 2007, 42 U.S.C. § 17013, the U.S. Department of Energy (“GOVT”) administers the Advanced Technology Vehicle Manufacturing (ATVM) loan program to support the manufacture of advanced technology vehicles and components in the United States. In 2008, Congress authorized the GOVT to make \$25 billion in ATVM loans. GOVT currently has over \$16 billion of unused lending authority. Congress-people, GOVT agency executives and their Silicon Valley financiers invested in stock ownerships of the upside collateral profits from the manipulation of Department of Energy and foreign mining benefits from Iraq, Afghanistan, and other foreign mining regions.

193. The parties, for valuable consideration, entered a valid and enforceable contract (with subsequent Work Orders as set forth above) for the performance of services by the Plaintiffs for the Defendant in return for money payments by the Defendant.

194. Plaintiffs have attempted hundreds of “proper procedure” efforts to resolve this matter in writing but government officials either: 1.) Stonewall any response, or 2.) Get fired or transferred if they investigate the matter, or 3.) Send a generic non-responsive form letter, or 4.) Finger point to another agency in an endless runaround.

195. Plaintiffs was attacked by government-financed, directed, and resourced hired attack services that had command-and-control operated by government officials.

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1 196. The GOVT has spent over ten times more money on delaying the payment of funds to the  
2 Plaintiffs than if they had just settled with WITNESS in the first place. The GOVT has  
3 exacerbated the case to the point that it has gained thousands of times more media coverage  
4 than if they had just settled with WITNESS in the first place. The GOVT has wasted vast  
5 amounts of taxpayer money and created an international media incident when those losses  
6 could have been entirely avoided if they had just settled with WITNESS, and been responsive  
7 to the Plaintiffs, in the first place.  
8

9 197. The Defendants failed to properly respond to the Plaintiffs by all sorts of avoidance tactics.

10 198. Pursuant to the contract, Project Materials, including all materials, processes, techniques,  
11 and data, including all intellectual property made or conceived or reduced to practice or  
12 learned by DEFENDANT, was owned a duty to the Plaintiffs ONLY.

13 199. DEFENDANT breached the material portion and express terms of the contract between  
14 Plaintiffs and Defendant.

15 200. Plaintiffs have made various requests for Defendant to comply with the contractual terms,  
16 but Defendant has refused.  
17

18 201. Defendant's breach of contract has damaged the Plaintiffs in an amount exceeding \$75,000.  
19  
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21

22 **III. CONVERSION**  
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24

25 202. The Plaintiffs repeats and re-alleges each of the foregoing allegations as thoughtfully set  
26 forth herein.

27 203. Plaintiffs car design used advanced "hot-swap cartridges" to provide a nearly unlimited range,  
28 cost less than \$20,000 in the base configuration, required no gasoline or extension cords to charge,

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1 required no garage, could be used by apartment dwellers, was easy to repair and build, and used  
2 “damp down” crash effect reduction materials.

3 204. Plaintiffs had operations in Detroit, the Midwest, and the San Francisco Bay area. A critical  
4 Plaintiffs innovation, based on a decade of research, was the use of next-generation polymer plastics  
5 in the automotive body. By replacing metal doors, body panels, hoods, and roofs with lightweight  
6 polymer plastics on a carbon fiber frame and lightweight alloy chassis, Plaintiffs build a four-seat,  
7 SUV-format vehicle with a curb weight of less than 1,400 pounds, or approximately one-third the  
8 weight of a Toyota Prius. This, in turn, enhanced vehicle efficiency and performance.  
9

10 205. Plaintiffs pressure membrane technology was well proven and widely used in a variety of  
11 applications, including zodiac (inflatable) boats used in leisure, commercial and military  
12 applications, airbags, Mars landing equipment, and even buildings and arenas with polymer  
13 membrane coverings.  
14

15  
16 206. All the Plaintiffs car’s key parts were built and evaluated, or already existed in off-the-shelf  
17 components proven in the industry for over a decade. Autodesk and other engineering software  
18 allowed for full virtual prototyping and operational testing of the design.

19 207. All the Plaintiffs products were the top of the line for their precision and design. For  
20 consideration of Plaintiffs ATVM loan application, Defendants promised to protect Plaintiffs  
21 technical and business. The DEFENDANT used the products and information of the Plaintiffs  
22 without his permission or consent. The DEFENDANT has committed conversion of the Plaintiffs  
23 PROPERTY. The DEFENDANT has committed conversion which is based upon the  
24 DEFENDANT’s unlawful exercise of ownership or control over the personal property of the  
25 Plaintiffs. The exercise of ownership or the control by the DEFENDANT was intentional and have  
26 the effect of denying or repudiating the Plaintiffs rights to the property.  
27

28 208. The Plaintiffs conversion b has damaged the Plaintiffs in an amount exceeding \$75,000.



#### IV. UNJUST ENRICHMENT

209. The Plaintiffs repeats and re-alleges each of the foregoing allegations as thoughtfully set forth herein

210. The Defendants promised Plaintiffs a salary of an average of \$200,000.00 per year as precedent-ed by similar employees and contractors in the same time period, in consideration for her exclusive work with working with the government. Yet, Plaintiffs did the work but was not compensated properly.

211. Plaintiffs have attempted hundreds of “proper procedure” efforts to resolve this matter in writing but government officials either: 1.) Stonewall any response, or 2.) Get fired or transferred if they investigate the matter, or 3.) Send a generic non-responsive form letter, or 4.) Finger point to another agency in an endless runaround.

212. Plaintiffs was attacked by government-financed, directed, and resourced hired attack services who had command-and-control operated by government officials.

213. The GOVT has spent over ten times more money on delaying the payment of funds to the Plaintiffs than if they had just settled with Plaintiffs in the first place. The GOVT has exacerbated the case to the point that it has gained thousands of times more media coverage than if they had just settled with Plaintiffs in the first place. The GOVT has wasted vast amounts of taxpayer money and created an international media incident when those losses could have been entirely avoided if they had just settled with Plaintiffs and been responsive to the Plaintiffs, in the first place.

214. Many government officials, up to and including the U.S. Attorney General, The Secretary of Energy, The Director of the FBI, etc., have been fired over this case and related matters, due to their attempts to manipulate government funds and resources to inure to a cartel of insiders who backed those officials’ appointments to those positions. (i.e.: The Covington & Burling files), LDLinsiders who backed those officials’ appointments to those positions. (i.e.: The Covington & Burling files)

1 LDLinsiders who backed those officials' appointments to those positions. (i.e.: The Covington &  
2 Burling files)

3 215. Plaintiffs became a government witness and reported on crimes by government officials. In  
4 reprisal, revenge, vendetta, retaliation, and retribution, Plaintiffs have been severely harmed. The  
5 angry government officials took away the Plaintiffs QUALITY OF LIFE.

6 216. Plaintiffs have lost everything which includes his house, income, job, life savings, brand, and  
7 every source of income using sophisticated spy craft-type attacks. They attacked him as  
8 reprisal/vendetta because he reported an organized crime activity involving famous U.S. Senators  
9 and their billionaire sex-addict financiers. (i.e.: for context, look up the court cases of Jeffrey  
10 Epstein, Andy Rubin, Howard Rubin, Ed Buck, and the hundreds of other related sex cult cases in  
11 the federal courts on <http://www.pacer.gov>.)

12 217. The Plaintiffs served the public, only to have the criminals they investigated get hundreds of  
13 billions of dollars, at the expense of the Plaintiffs and public tax dollars, while Plaintiffs got nothing  
14 and lost everything

15 218. The Defendants deliberately failed to live up to the terms of the agreement and have not paid  
16 the proper wages.

17 219. The Defendants benefitted from Plaintiffs work on numerous occasions but failed to pay  
18 Plaintiffs a just compensation for the work that he performed.

19 220. Thus, the Defendants have been unjustly enriched.

20 221. The Plaintiffs are entitled to damages.

## 21 **V. FRAUDULENT MISREPRESENTATION**

22 222. The Plaintiffs repeats and re-alleges each of the foregoing allegations as thoughtfully set forth  
23 herein.

24 223. Plaintiffs offered GOVT asset collateral of over \$100 million to secure the ATVM loan.  
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1 224. Plaintiffs loan application revealed sensitive and confidential technical and business  
2 information as defined by 10 CFR §§ 1004.10(b)(4), 11 and 5 U.S.C. § 552(b)(4) to GOVT. This  
3 information included fuel cell and hydrogen storage technologies, fuel cassettes and pressure  
4 membrane body parts.

5 225. 103. Plaintiffs was unaware that Defendants had “fixed” the ATVM loan process to benefit  
6 political donors. Plaintiffs also was unaware that Defendants had no intention of approving  
7 Plaintiffs ATVM loan application under any circumstances as a matter of reprisal for whistle-  
8 blowing and unfair business practices to avoid competition against Tesla and other Congressional  
9 stock holdings.  
10

11 226. Therefore, Plaintiffs repeatedly contacted GOVT to provide engineering, financial and other  
12 information in support of its application.

13 227. On April 23, 2009, Jason Gerbsman, the Chief of Staff and Senior Investment Officer, at the  
14 Loan Programs Office, Automotive Division, of GOVT, notified Plaintiffs that: Plaintiffs have  
15 submitted a complete application and has been assigned to both a technical eligibility and merit  
16 review team, as well as a financial viability analysis team. The technical team is close to finishing  
17 their evaluations on both eligibility and project merit, and the financial team will be launching a  
18 more detailed and interactive due diligence phase of the Plaintiffs application review very soon.  
19 Following the technical and financial evaluation under the second stage of the process, we will  
20 move into the underwriting phase where our goal is to negotiate a conditional commitment,  
21 including a detailed term sheet. This will be followed by the fourth phase of the loan process where  
22 the final details will be negotiated, and the loan will be close  
23  
24

25 228. On May 26, 2009, Gerbsman offered an in-person meeting to discuss “Plaintiffs next steps.”

26 229. On May 28, 2009, Plaintiffs flew a delegation from California to meet with Gerbsman, who  
27 said that GOVT had determined “everything was in order” with Plaintiffs ATVM loan application,  
28

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1 that “everything looked good” and that Plaintiffs “appeared to be fully compliant and passed  
2 technical review.”

3 230. Shortly thereafter, Plaintiffs discovered that Tesla Motors, Inc. (“Tesla”) and Fisker Motors,  
4 Inc. (“Fisker”) had received and were receiving special assistance from GOVT staff with the  
5 ATVM loan application process. Fisker even had a business office in GOVT’s headquarters.

6 231. On or about June 22, 2009, GOVT advised Plaintiffs that a Northern California solar energy  
7 company had requested a copy of Plaintiffs ATVM loan application from GOVT through the  
8 Freedom of Information Act (“FOIA”). Plaintiffs contacted this company to see why it was  
9 interested in Plaintiffs ATVM loan.  
10

11 232. Plaintiffs spoke with the company’s principal, who said that he had been “screwed over” by  
12 GOVT and wanted to know if others had a similar experience. He said that the company had  
13 suffered “bad dealings” with Matt Rogers, a “stimulus advisor” to the Chu from McKinsey &  
14 Company, and Steven Spinner, a key player in GOVT’s loan program office. Spinner, an Obama  
15 campaign bundler who raised millions for the President and who had been appointed to his  
16 government position in exchange for his fundraising, also had worked at McKinsey & Company  
17 and, according to his biography posted by the Center for American Progress, had served as an active  
18 advisor and investor to Tesla.  
19

20 233. Plaintiffs was told that Rogers and Spinner were “rigging the game.” It was given Spinner’s  
21 phone number and told to call Spinner and ask him why Plaintiffs ATVM loan application was not  
22 moving forward.  
23

24 234. Plaintiffs texted Spinner and then called him. Spinner answered the phone and told Plaintiffs  
25 words to the effect of “Do not ever call me again. The awards have already been decided.”

26 235. On June 24, 2009, GOVT announced \$8 billion in ATVM loans to Ford Motor Company  
27 (“Ford”), Nissan North America, Inc. (“Nissan”) and Tesla. Tesla was the Plaintiffs competitor --  
28

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1 received an ATVM loan of \$465 million at a rate of 1.6% from GOVT to manufacture an expensive  
2 electric car.

3 236, On June 29, 2009, Plaintiffs wrote to Gerbsman again asking for action on its ATVM loan  
4 application, pointing out that other lenders were hanging back until after GOVT issued its term  
5 sheets, the offering document issued by GOVT that specifies the detailed terms and conditions  
6 under which GOVT may enter a Conditional Commitment with the Applicant.

7 237. In the following weeks, authorized GOVT representatives repeatedly assured Plaintiffs that  
8 “everything was fine”, “everything is on-track”, and “you [WITNESS] appear to meet every  
9 criterion” with respect to an ATVM loan. Plaintiffs was even told that “we [GOVT] should be able  
10 to announce [an approved ATVM loan] any day now...”

11 238. However, on August 21, 2009, Seward denied Plaintiffs ATVM loan application. **See**  
12 **Exhibits and evidence websites at <http://www.majestic111.com> and [http://www.the-truth-](http://www.the-truth-about-the-dept-of-energy.com)**  
13 **about-the-dept-of-energy.com**

14 239. In an email to GOVT’s Chris Foster, Plaintiffs requested GOVT’s merit review documents  
15 and asked how GOVT technical evaluators could conduct a ten-month comparative merit review of  
16 Plaintiffs ATVM loan application without speaking to any single company engineer or senior  
17 project staff member for more than 1% of the time that GOVT staff attended to Tesla, Nissan Ford,  
18 and Fisker during the same review period.

19 240. On or about August 26, 2009, Plaintiffs called Foster. Foster said GOVT had denied the  
20 application because Foster said Plaintiffs “electric car did not use E85 gasoline, Plaintiffs was not  
21 planning on building “enough” cars, Plaintiffs was not planning on selling cars to the government,  
22 Plaintiffs electric motors t and batteries were too futuristic and not developed for commercial use,  
23 Plaintiffs car was a “hydrogen car,” and Plaintiffs had underestimated the cost of metal body  
24 fabrication.”

25 241. The reason given for the denial of the loan was based on false pretense.  
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1 242. Defendants made false and misleading statements to Plaintiffs regarding his duties and  
2 application process for the grant application and approval.

3 243. DEFENDANT made false allegations regarding the responsibilities and duties of the  
4 grants/loan and there was no causal connection.

5 244. DEFENDANT made false promises to the Plaintiffs.

6 245. DEFENDANT made false and misleading statements to Plaintiffs regarding his duties and the  
7 responsibilities regarding the application process.

8 246. DEFENDANT made false and misleading statements to Plaintiffs and there was no causal  
9 connection.

10 247. DEFENDANT fraudulently concealed information regarding the grants and the application  
11 process and the final assessment regarding the application process.

12 248. DEFENDANT made false promises regarding the conduct and what is necessary regarding the  
13 loan process.

14 249. DEFENDANT has fraudulently concealed information relating to the issue of the LOAN.

15 250. There is a causal connection between the real reason the loan application was denied because  
16 the DEFENDANTS made false pretenses regarding the loan and applicant process.

17 251. DEFENDANTS have made false promises to conduct and failed to disclose objectives  
18 regarding the LOAN.

19 252. DEFENDANTS have made false and misleading statements and concealed material  
20 information concerning the LOAN.

21 253. In so doing, DEFENDANTS further violated their duties under the law regarding the  
22 application process and approval of the LOAN.

23 254. DEFENDANTS and their co-conspirators have made a material misrepresentation, have  
24 omitted material facts, and have concealed material information concerning the application and loan  
25 process.  
26  
27  
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255. The Plaintiffs have been harmed and is entitled to damages.

## VI. FRAUDULENT CONCEALMENT

256. The Plaintiffs repeats and re-alleges each of the foregoing allegations as thoughtfully set forth herein.

257. Foster never provided Plaintiffs with GOVT's merit review documents or described the applicable evaluation criteria. On September 21, 2009, Plaintiffs wrote to Chu requesting reconsideration of GOVT's ATVM loan denial. **See Exhibit**

258. Plaintiffs demonstrated that the stated reasons for GOVT's denial were false. It asked Chu to explain why GOVT staff repeatedly assured Plaintiffs that approval would be forthcoming and that no additional information was necessary (leading Plaintiffs and its principals to expend huge sums of money in reliance thereon), and why government-crony companies that applied after Plaintiffs were reviewed earlier, given the benefit of extensive access to and interaction with GOVT staff (a benefit denied to Plaintiffs), and then awarded funds.

259. On October 23, 2009, Seward replied to Plaintiffs. **See Exhibits**. He did not answer Plaintiffs questions. Instead, he backfilled with new but equally baseless reasons for Plaintiffs rejection.

260. The reason for the denial was unreasonable. To begin with, Seward said that Plaintiffs application was "deemed Substantially Complete on November 10, 2009." In fact, APPLICATION'S application had been given deemed complete on December 31, 2008.

261. Seward said that the "proposed technology appeared to be at a development stage and not yet ready for commercialization" and that the "assumption that the vehicle concept would be ready for production in three years" was a "significant weakness" due to the "high level of risk associated with the design." In fact, the Plaintiffs vehicle's technology had been in use commercially for years by the U.S. Department of Defense, NASA, and the automobile industry; the politically connected companies that were awarded ATVM loan funds were no further ahead in production than



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1 Plaintiffs, and elements of Plaintiffs “elevated risk design” were already in use by Toyota and  
2 Nissan.

3 262. The second reason given by Steward was baseless. Seward said, “the proposed project’s  
4 impact on fuel economy...was determined to be weak.” In fact, non-gasoline-powered automobiles  
5 are uniformly recognized to offer the most significant impact on fuel economy performance.

6 Plaintiffs vehicle promised even better fuel economy than any of the ATVM loan “winners” (Tesla,  
7 Nissan, Ford or Fisker) proposed or offers to this day.

8 263. The third reason given by Steward was groundless. Seward said, “A review of the advanced  
9 fuels in your project and the feasibility of that energy source...was [sic] questionable.” In fact, the  
10 fuels, products, and subparts of the “questionable” energy source are readily available to consumers  
11 at REI Sporting Goods, Amazon.com, and Safeway supermarkets.

12 264. The fourth justification given by Steward for the denial as it was unrealistic. Seward said, “A  
13 review of the calculations and assumptions supporting your claims for reductions in petroleum use  
14 were deemed to be unrealistic.” In fact, over two hundred institutional research and white papers  
15 from respected government and university agencies from around the world supported Plaintiffs  
16 claimed reductions.

17 265.. Seward’s letter was the first time any of these issues had been raised by GOVT with the  
18 Plaintiffs, notwithstanding ten months of “underwriting,” and multiple meetings, phone calls, and  
19 emails. Incomprehensibly, GOVT had refused to consult with any of Plaintiffs engineers and denied  
20 Plaintiffs the “interactive” review that had been promised in April and had in fact been provided to  
21 Tesla, Fisker, Nissan, and Ford.

22 266. DEFENDANTS did not review the Plaintiffs ATVM loan application in good faith and in  
23 accordance with its regulations, policies, and promises. Instead, it stonewalled WITNESS.

24 267. Each application that the Plaintiffs presented was denied.  
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1 268. ON or about February 1, 2009, Plaintiffs (through Limnia) applied for a \$15 million ATVM  
2 loan to help fund work with GOVT's own Sandia National Laboratories ("Sandia") to produce a  
3 "best of breed and state of the art" automobile energy storage system using Plaintiffs patented fuel  
4 cell technology

5 269. DEFENDANTS and their co-conspirators have made material misrepresentations, have  
6 omitted material facts, and have concealed material information concerning the LOAN.

7 270. DEFENDANT concealed or suppressed a material fact

8 271. DEFENDANT had knowledge of the material fact

9 272. The Plaintiffs f suffered damage because of the DEFENDANT's action.

10 273 The DEFENDANT suppressed or concealed this fact with the intention that the Plaintiffs be  
11 misled as to the true condition

12 274. The Plaintiffs was so misled by the actions of the DEFENDANTS.

13 275. The Plaintiffs suffered damage as a result

14 276. The Plaintiffs repeats and re-alleges each of the foregoing allegations as thoughtfully set forth  
15 herein.

16 277. The acts and events set forth above constitute negligent and wrongful acts and omissions of  
17 agents and employees of the U.S. Government, inter alia, negligent investigation, abuse of process,  
18 conversion of personal property, denial of the right to legal counsel, infliction of emotional distress  
19 and interference with a prospective economic opportunity while acting within the scope of their  
20 offices and employment, under circumstances where the Defendant U.S., if a private person, would  
21 be liable to the Plaintiffs in accordance with the laws of the Washington, D.C.

22 278. The Plaintiffs are entitled to damages to determine by a jury.

23 **VII. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

24 279. The Plaintiffs repeats and re-alleges each of the foregoing allegations as thoughtfully set  
25 forth herein.

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1 280. As set forth above, Defendants agreed to participate together in a common scheme to commit  
2 unlawful acts, or to commit lawful acts by unlawful means, including, but not limited to, unlawfully  
3 obstructing federal officials in the performance of their constitutional duties,

4 281. Pursuant to, and in furtherance of that common scheme, Defendants exhibited extreme and  
5 outrageous conduct that went beyond all bounds of decency. This conduct intentionally or  
6 recklessly caused the Plaintiffs to suffer from severe emotional distress, as described supra.

7 282. Based on the foregoing, all Defendants are liable to the Plaintiffs for the resulting damage.  
8

9 **VIII. VIOLATION OF 28 U.S.C. §2680 (h)**

10 283. The Plaintiffs repeats and re-alleges each of the foregoing allegations as though fully set forth  
11 here2in.

12 284. The acts and events set forth above constitute negligent and wrongful acts and omissions of  
13 agents and employees of the U.S. Government, inter alia, negligent investigation, false  
14 imprisonment, abuse of process, conversion of personal property, infliction of emotional distress  
15 and interference with a prospective economic opportunity while acting within the scope of their  
16 offices and employment, under circumstances where the United States, if a private person, would be  
17 liable to the Plaintiffs in accordance with the laws of the State of Oklahoma. Because these acts and  
18 events were undertaken and caused by investigative and law enforcement agents or persons holding  
19 themselves out as law enforcement agents of the Defendant U.S., the U.S. Government is liable for  
20 all damages caused by such acts, as provided by 28 U.S.C. §2680(h).  
21

22 285. The Plaintiffs are entitled to damages  
23

24 **IX. VIOLATION OF FEDERAL TORTS CLAIMS ACT**

25 286.. The Plaintiffs repeats and re-alleges each of the foregoing allegations as thoughtfully set forth  
26 herein.

27 287. The acts and events set forth above constitute negligent and wrongful acts and omissions of  
28 agents and employees of the U.S. Government, inter alia, breach of contract, unjust enrichment,

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1 fraudulent misrepresentation, fraudulent concealment, conversion of personal property, , infliction  
2 of emotional distress, and interference with a prospective economic opportunity while acting within  
3 the scope of their offices and employment, under circumstances where the Defendant U.S., if a  
4 private person, would be liable to the Plaintiffs in accordance with the laws of Washington, D, C.  
5 for the District of Columbia.t

6 288. The Plaintiffs are entitled to damages

7 **X. INFRINGEMENT ON PATENT NUMBERS ASSIGNED TO Plaintiffs**

8  
9 289. The Plaintiffs repeats and re-alleges each of the foregoing allegations as thoughtfully set forth  
10 herein.

11 290. The Plaintiffs aresued PATENTS are valid and enforceable.

12 291. DEFENDANT has infringed and continues to infringe the claims of Plaintiffs aresued patents  
13 under 35 U.S.C. § 271(a), either literally or under the Doctrine of Equivalents, by operating and  
14 using the patent process within the United States that is covered by the claims of the patents listed at  
15 <http://www.uspto.gov>.

16  
17 292. DEFENDANT has had knowledge and notice of the Plaintiffs patent,s as well as of its own  
18 infringement of the patents, since the first communications with Plaintiffs and virtue of the present  
19 Complaint.

20 293. On information and belief, DEFENDANT has had knowledge and notice of the patents,  
21 including asking the U.S. Department of Energy to request valuation reports on the Plaintiffs  
22 patents as well as of its own infringement of the ‘patent.

23  
24 294. DEFENDANT has had the knowledge and notice of the patents, as well as of its own  
25 infringement of the patents, since the first communications with Plaintiffs and virtue of the present  
26 Complaint.

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1 295. Plaintiffs have been and continues to be damaged by DEFENDANT's infringement of the  
2 Plaintiffs patent. On information and belief, a reasonable royalty for infringement of the patents  
3 would be at least \$300,000.000.00 of loss revenue resulting from its infringing activities.

4 296. DEFENDANT's infringement of the Plaintiffs patents has been and continues to be willful.

5 297. DEFENDANT's infringement of the Plaintiffs patents renders this case exceptional within the  
6 meaning of 35 U.S.C. § 285.

7 298. Plaintiffs are entitled to damages.  
8  
9

10 A. A declaration pursuant to 28 U.S.C. §§ 2201 and 2202 and 5 U.S.C. § 706(2)(B) that the denial  
11 of 'Plaintiffs applications was unlawful, and compensatory and injunctive relief directing GOVT to  
12 approve same.  
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**EXHIBITS**  
**(Attached In Electronic Filing)**

## EXHIBIT 1 – Exhibits And Exhibits Summation

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The evidence herein is relatively indisputable because most of it was cut-and-paste from the files of the FBI, SEC, OSC, DOJ, FEC, Interpol, FINCEN, ICIJ, Congress and all of the most renown and respected law enforcement, regulatory and news investigators in the world!

Key Plaintiffs personally knew famous politicians, and their Big Tech financiers, (Some even stayed at his house) who joined forces to manipulate government funds, and stock market rigged "market pumps" into their own pockets in the last two "stimulus" funds. Plaintiffs was invited into the scheme but declined and became a federal witness.

There has never been so much taxpayer cash given to so few people, where each, and every, one of the recipients was a friend of the politicians. Those who got the cash immediately skimmed "unjust stock market profits" with it and paid kick-backs to the politicians. Plaintiffs found out that their political representatives own the stocks and assets of their competitors, have sex with and party with their competitors, get tens of millions of dollars of election manipulation services from their competitors and use government spy agencies and public services agencies to screw over competitors. Most of Plaintiffs political representatives work for corporations who abuse the public and they do it out of pure mercenary greed and lust for power.

‘Big Tech’ Cartel companies: Google, YouTube, Netflix, Tesla, Facebook, et al, coordinated to hire the same little organized group of lawyers, CPA’s, lobbyists, opposition research attack services, paid-under-the-table “reporters” and CPAC managers. This created an FBI-prosecutable “Enterprise” as defined by the RICO Racketeering laws. This ‘Enterprise’ coordinated political



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1 campaign funding and internet manipulation to the exclusive benefit of this 'Enterprise' and paid  
2 payola, in stocks, to corrupted, and famous, political figures who assisted them. In FCC, DOE and  
3 EPA contracts, grants, tax waivers and insider regulation blockades, almost every person at those  
4 agencies held stock in, or was paid and/or hired, by this Cartel. That is a felony abuse of public  
5 resources!

6  
7 Almost every competitor to the insiders, including Plaintiffs, was attacked and sabotaged using state  
8 and federal resources to pay Fusion GPS, Black Cube, The Denton Tabloids, Media Matters, In-Q-  
9 Tel and other attack services. The victims demand justice and restitution for the government  
10 investment fraud, loss of years of their lives under a false federal pretext, harassment and  
11 interference they suffered. The victims seek to be compensated for the malicious, proven,  
12 retribution tactics, lies, toxic exposures, vendetta cut-offs of all earned government funds and  
13 benefits, tort-based interference, "missing hard drives" and interdiction efforts conducted, with  
14 applicants own tax dollars, against the applicants. White House senior executives and California's  
15 most powerful Senators hired a tabloid publisher to seed the internet with self-produced defamation  
16 articles and animated attack videos and paid Google to manually lock those attack media items on  
17 the first line of every Google and YouTube search, around the globe, for over a decade. Orders were  
18 given, BY the Defendants, TO certain federal agencies directing those agencies to with-hold  
19 beneficial actions, FOR Plaintiffs, as reprisal for reporting the crimes.

20  
21  
22  
23 This is a felony-class slush-fund crime that has cost taxpayers trillions of dollars in losses and has  
24 cost Plaintiffs many tens of millions of dollars in damages and losses. The government has lost  
25 billions of dollars from Defendants tax evasions and money laundering and Google, for example,  
26 failed to report over a billion dollars of political campaign contributions.  
27  
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1 Big investment banks like J.P. Morgan, Goldman Sachs, et al. coordinated these schemes with  
2 money laundering, tax evasion, offshore covert funds and other financial trickery. FinCEN, Interpol,  
3 FBI, GAO, and most other investigators, have proof of these assertions but they have been stalled  
4 from making arrests. The money-tracks go right back to the politicians families from the bank  
5 accounts of Google, Facebook, Tesla, Netflix, Sony Pictures, etc; forensic accounting records.  
6 Government agencies were in charge of making sure these crimes did not happen but they chose to  
7 'steal instead of serve'! They chose to help these crooks 'cheat instead of compete'!

9  
10 The politicians that the taxpayers EMPLOY do not get to make hundreds of millions of dollars in  
11 crooked profits off of government funds that are supposed to help citizens under duress. They won't  
12 let Plaintiffs have a jury trial, or a live Senate hearing, because they know they will lose and they  
13 will be shamed!

14  
15  
16 Defendants are government employees and contractors and their political financier corporations and  
17 individual high net worth oligarch owners.

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22 <http://www.majestic111.com>  
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**EXHIBIT 2 - State-Sponsored Reprisal Attacks And Harms Against The Whistle-Blowers:****- DEFRAUDING Plaintiffs:**

Government agency bosses solicited the targets with false promises of future loans, carbon credit sales, billions of dollars of stock market valuation profits, contracts and/or grants from their agencies and caused the target Plaintiffs to expend millions of dollars and years of their time for projects which those government bosses had covertly promised to their friends. They used the target Plaintiffs as a “smokescreen” to cover their illegal government slush-funds for the Plaintiffs competitors and personal enemies. By using this tactic, the attackers drained the target Plaintiffs funds and forced Plaintiffs into an economic disaster, without the government bosses fearing any reprisal for their scam. The crony insiders made hundreds of billions of dollars in profit in the notorious Solyndra-type scandals as seen in the CBS 60 Minutes episode: “*The Cleantech Crash*”, thousands of TV news segments and the related GAO and Congressional corruption reports.

**- MOLES AND SPYING:**

White House financier Kleiner Perkins placed moles inside of Plaintiffs companies in order to sabotage, delay and misdirect operations. The moles were discovered to be staff of Kleiner Perkins. The main offices of Kleiner Perkins were broken into, per San Mateo County police reports, and records of corruption copied or duplicated by a state-sponsored intelligence agency entity, which provided further proof that Kleiner Perkins and the White House were exchanging Quid Pro Quo.

**- BLOCKADES OF LEGAL COUNSEL RIGHTS:**

- Government officials and the federal agency: Legal Services Corporation (LSC corporation -A federal agency dedicated to providing legal services to citizens) blockaded Plaintiffs rights to legal representation in order to prevent Plaintiffs from personally suing the attackers because such a lawsuit would have embarrassed corrupt public officials. High tech law firms that were discussing a services agreement with Plaintiffs were threatened and

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ordered to not help Plaintiffs or “*they would be black-listed or be cut-off from tens of millions of dollars of Google, Netflix, Facebook and government contracts*”. Individual lawyers were threatened with black-listing and getting “*flooded with more filings than you could ever respond to in your life-time...*” LSC officials, who were almost entirely Obama Administration associates, refused to assist with lawyer referrals. That is a violation of their federal contract with The U.S. Government .

**- HIRED CHARACTER ASSASSINATION AND DEFAMATION SERVICES:**

An sophisticated animated attack film was produced by Google/Youtube and Nicholas Denton attacking Plaintiffs. An animated film is an expensive effort involving considerable time and expense. An attacker must be well financed to undertake such an effort. The film was published on YouTube and locked onto the very top search result line on every YouTube search in front of 7.5 billion internet users for over a decade. The damage to Plaintiffs reputation is estimated in the tens of millions of dollars. YouTube steadfastly refused to remove or adjust the search results even though YouTube executives knew Plaintiffs and knew that the video represented a character assassination attempt against Plaintiffs because YouTube owners finance the political campaigns of the public officials who ordered the attacks. While Google/YouTube stated to Congress that all of it’s search results are arbitrary, the never-moving search result of this attack video proved that Google’s and YouTube’s search results are manually manipulated by human maintained black-lists. The corrupt officials hired Nicholas Guido Denton and his character-assassination-for-hire sleazy tabloid publication empire known as Gawker Media AKA Gizmodo Media. They own Gawker, Gizmodo, Jalopnik and a number of fake news sites based in the USA and near-Russian regions. The offshore sites are used for money laundering and tax evasion. The FBI has been asked to interview and financially trace the payments and command-and-control orders back and forth between Nicholas Guido Denton and his attacker/operatives: Ian Fette, Adrian Covert, Nick Cook, Gabrielle Darbyshire, John Hermann, Patrick George, et al and Google. All of whom transferred payments and communications between each other to conspire, operate, produce and publish the articles,

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1 videos, blogs and server manipulations for the attacks against the victims around the world.  
2 These attacks resulted in billions of dollars of damages to the victims. The orders for these  
3 attacks can be traced back to The White House.

4 **- FACTORY PROCESSED SOCIAL MEDIA ATTACKS:**

5 Social networking sites including MeetUp, Match, Facebook, etc. and all other IAC-owned,  
6 or similar, sites (IAC is managed by Hillary Clinton's daughter, whose Mother knew  
7 Plaintiffs) have had their profiles, texts, and inter-member communications, since those  
8 companies were started, hacked or purchased. The financiers of almost everyone of these  
9 sites are also the financiers of the suspects. The attack service providers use Palantir,  
10 Acronym, In-Q-Tel financed data analysis software to analyze every activity in those  
11 services in order to find honey-trap, blackmail and social conflict exploitation opportunities.  
12 Your social life will, essentially, end. Every photo on every social site is cross checked with  
13 every other photo on the internet in order to cull your Facebook, Linkedin, Snapchat and  
14 other social media together to create a total manipulation profile data file on you. New  
15 contacts on these sites were contacted by the attackers and told to "avoid" the Plaintiffs in  
16 order to damage Plaintiffs.

17 **- GOVERNMENT BENEFITS BLOCKADES AND MANIPULATIONS:**

18 Social Security, SSI, SDI, Disability and other earned benefits were stone-walled.  
19 Applications for benefits for the Plaintiffs were intentionally "lost" like a "Lois Lerner hard  
20 drive". Files in the application process "disappeared". A U.S. Senator ordered Plaintiffs  
21 benefits to "never be approved" even though Plaintiffs worked 60 hour+ weeks for decades  
22 in service to their nation and their community. A SSA official in the local SSA office, who  
23 had a devout expressed hatred against one United States President ordered a benefits  
24 blockade against Plaintiffs because he found out that Plaintiffs ex-lawyer now worked in the  
25 White House. Forensic evidence and backgrounders on every person who worked on, or had  
26 access to, Applicants files, records, benefits decisions and related data sets shows that a  
27 number of those employees and contractors were members, financiers, web promoters or  
28 supporters of ANTIFA anarchy groups or KKK or Proud Boys related political activist-type

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1 groups. In San Francisco and Marin Counties SSA offices, in employees workspaces and on  
2 their Facebook and MySpace sites, many employees proudly display pictures of themselves  
3 wearing their pink "pussy hats", black riot gear and sporting political tattoos. FBI records  
4 and IG investigations show that SSA has the highest percentage of political activist  
5 employees of any federal agency. Such persons are inclined to become drunk with power  
6 when allowed access to the trillions of dollars of government technology on the SSA file and  
7 decisions systems. A number of these persons have worked for, or with, U.S. Senators and  
8 other politicians who targeted Applicant in political reprisal. At least 3 persons in the San  
9 Francisco SSA office, at least 2 persons in the San Mateo SSA office and at least 2 persons  
10 in Marin SSA office are known to have engaged in such actions. Applicants funding and  
11 benefits were manipulated, so as to harm Applicant, as political reprisal as vendetta for his  
12 provision of testimony to federal investigators in a trillion dollar political corruption matter  
13 involving famous political figures featured in global news coverage. A vast number of  
14 agency abuse cases and lawsuits are now on public record in the Inspector General's offices  
15 and federal courts. It is an indisputable fact that some government agencies run "hit-jobs" on  
16 citizens on orders from certain corrupt politicians.

17 These actions are felony violations of the law. Federal and State Agencies including SSA,  
18 FEC, GOVT, HHS, VA, CIA, HUD, SA, SEC, FBI, DOJ and many others, have been  
19 charged, and found guilty, in these crimes against citizens. In the Congressional  
20 investigation published by the United States Congress in review of the U.S. Department of  
21 Energy LGP/ATVM programs, it is clearly proven that the U.S. Department of Energy was  
22 used as a slush-fund by some GOVT executives in order to pay off campaign financiers by  
23 attacking and sabotaging their competitors. The GOVT Paducah Gaseous Diffusion Plant  
24 under contracts with The U.S. Government and the government-owned U.S. Enrichment  
25 Corp paid \$5M whistle-blower awards to those whistle-blowers who were attacked, using  
26 government agency resources, for reporting a crime. Dept. of Energy Hanford URS has  
27 agreed to settle a lawsuit brought by former employee Walter Tamosaitis for \$4.1 million.  
28 The settlement in the whistle-blower case comes almost one year before the case was set for

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1 a jury trial in federal court in Richland and compensates Tamosaitis for attacks against him,  
2 by GOVT officials, in retribution for reporting a crime. VA officials attacked hundreds of  
3 citizens who reported corruption, ie:

4 [https://www.thenewamerican.com/usnews/health-care/item/18610-va-whistleblowers-](https://www.thenewamerican.com/usnews/health-care/item/18610-va-whistleblowers-facing-retribution)  
5 [facing-retribution](https://www.thenewamerican.com/usnews/health-care/item/18610-va-whistleblowers-facing-retribution). As shown in this report: [https://www.pogo.org/analysis/2018/08/new-](https://www.pogo.org/analysis/2018/08/new-report-confirms-whistleblower-retaliation-is-alive-and-well-at-department-of-veterans-affairs/)  
6 [report-confirms-whistleblower-retaliation-is-alive-and-well-at-department-of-veterans-](https://www.pogo.org/analysis/2018/08/new-report-confirms-whistleblower-retaliation-is-alive-and-well-at-department-of-veterans-affairs/)  
7 [affairs/](https://www.pogo.org/analysis/2018/08/new-report-confirms-whistleblower-retaliation-is-alive-and-well-at-department-of-veterans-affairs/), Agencies attack often and harshly. CIA and NSA executives have been widely  
8 shown to use spy tools to attack domestic citizens they don't like, ie:  
9 [https://www.dailymail.co.uk/news/article-2435011/NSA-employees-used-phone-tapping-](https://www.dailymail.co.uk/news/article-2435011/NSA-employees-used-phone-tapping-tools-spy-girlfriends-cheating-husbands.html)  
10 [tools-spy-girlfriends-cheating-husbands.html](https://www.dailymail.co.uk/news/article-2435011/NSA-employees-used-phone-tapping-tools-spy-girlfriends-cheating-husbands.html) , and hundreds of other news links that can be  
11 provided. Elon Musk and Tesla, as well as Eric Schmidt and Larry Page at Google, have  
12 been proven to use the CIA group: IN-Q-TEL, to run government sponsored/financed  
13 attacks on business competitors. In Civil Action No. 1:13-cv-00777-RBW GOVERNMENT  
14 AGENCIES WERE CAUGHT BEING USED FOR ATTACKS AGAINST CITIZENS  
15 AND PUNISHED IN THE COURT AND THE MEDIA! The IRS, and hordes of other  
16 government agencies have been caught and proven, IN COURT, to target and attack people  
17 for presumed political differences.

18 Why should we assume that the Social Security Administration is not ALSO doing this too  
19 to harm citizens who speak out? The Lois Lerner IRS attacks took many years to resolve. In  
20 an unprecedented victorious conclusion to a four year-long legal battle against the IRS, the  
21 bureaucratic agency admitted in federal court that it wrongfully targeted citizens, during the  
22 Obama Administration, because of their political viewpoints and issued an apology to those  
23 people for doing so. In addition, the IRS is consenting to a court order that would prohibit it  
24 from ever engaging in this form of unconstitutional discrimination in the future. In a  
25 proposed Consent Order filed with the Court, the IRS has apologized for its treatment of  
26 U.S. citizens including organizations from 20 states that applied for 501(c)(3) and (c)(4) tax-  
27 exempt status with the IRS between 2009 and 2012 -- during the tax-exempt determinations  
28 process. Crucially, following years of denial by the IRS and blame-shifting by IRS officials,



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1 the agency now expressly admits that its treatment of our clients was wrong and a total  
2 violation of our Democracy. As set forth in the proposed Order: “The IRS admits that its  
3 treatment of Plaintiffs during the tax-exempt determinations process, including screening  
4 their applications based on their names or policy positions, subjecting those applications to  
5 heightened scrutiny and inordinate delays, and demanding of some Plaintiffs’ information  
6 that TIGTA determined was unnecessary to the agency’s determination of their tax-exempt  
7 status, was wrong.

8 For such treatment, the IRS expresses its sincere apology.” Throughout litigation of this  
9 case, activists have remained committed to protecting the rights of the public who faced  
10 unlawful and discriminatory action by the IRS and other agencies. The objective from the  
11 very beginning has been to hold agencies accountable for corrupt practices.

12 This Consent Order represents a historic victory for the public and sends the unequivocal  
13 message that a government agency’s targeting of citizens organizations, or any organization,  
14 on the basis of political viewpoints, will never be tolerated and that revenge will be swift  
15 and vast. The Order will put an end, once and for all, to the abhorrent practices utilized  
16 against citizens, as the agreement includes the IRS’s express acknowledgment of – and  
17 apology for – its wrongful treatment of the public. While this agreement is designed to  
18 prevent any such practices from occurring again, rest assured that all public interest lawyers  
19 will remain vigilant to ensure that the IRS, SSA, DOJ or SEC does not resort to such tactics  
20 in the future. Per detailed reports, in March of 2012 lawyers began being contacted by  
21 literally dozens of citizens and groups who were being harassed by the Obama IRS after  
22 submitting applications for tax-exempt status. Their tax-exempt applications were held up  
23 for years (over seven years in some cases), and they began receiving obtrusive and  
24 unconstitutional requests for donor and member information. That began a now more than  
25 five and a half year fight with the burgeoning bureaucracy at the IRS. Then on May 10,  
26 2013, Lois Lerner, the then head of the IRS Tax Exempt Organizations Division, publicly  
27 implicated the IRS in one of the worst political targeting scandals of the century.  
28

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1 This is an extraordinary victory against government agency abuse. It sends a powerful  
2 warning to the deep state bureaucracy that it will not be allowed to violate the Constitution  
3 in order to silence and shut down the whistle-blowers. In addition to the IRS's admissions of  
4 and apology for its wrongful conduct, the Consent Order would specifically award Plaintiffs  
5 the following: - A declaration by the Court that it is wrong to apply the United States tax  
6 code to any tax-exempt applicant or entity based solely on such entity's name, any lawful  
7 positions it espouses on any issues, or its associations or perceived associations with a  
8 particular political movement, position or viewpoint; - A declaration by the Court that any  
9 action or inaction taken by the IRS must be applied evenhandedly and not based solely on a  
10 tax-exempt applicant or entity's name, political viewpoint, or associations or perceived  
11 associations with a particular political movement, position or viewpoint; and - A declaration  
12 by the Court that discrimination on the basis of political viewpoint in administering the  
13 United States tax code violates fundamental First Amendment rights.

14 Disparate treatment of taxpayers based solely on the taxpayers' names, any lawful positions  
15 the taxpayers espouse on any issues, or the taxpayers' associations or perceived associations  
16 with a particular political movement, position or viewpoint is unlawful. In the Order, the  
17 IRS has also agreed that (unless expressly required by law) certain actions against the  
18 Plaintiffs— i.e. the sharing, dissemination, or other use of information unnecessarily obtained  
19 by the IRS during the determinations process (such as donor names, the names of  
20 volunteers, political affiliations of an organization's officers, etc.) – would be unlawful. In  
21 addition, the IRS promises not to take any retaliatory action against our clients for exposing  
22 the targeting scheme. Finally, and of crucial significance, the IRS admits it targeted persons  
23 and groups based on their viewpoints (i.e., “policy positions”) and that such viewpoint  
24 discrimination violates fundamental First Amendment rights. This is the first time the IRS  
25 has admitted that its targeting scheme was not just “inappropriate” – as TIGTA found – but,  
26 as alleged, blatantly unconstitutional.

27  
28 To ensure consistency and uniformity within the agency's operations going forward, the IRS

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1 is required, pursuant to the Order, to inform all employees within the Exempt Organizations  
2 Division, as well as the Commissioners and Deputy Commissioners within other divisions,  
3 of the Order's terms. This Order not only validates allegations about their treatment at the  
4 hands of the corrupt Obama-era IRS but also provides important assurances to the American  
5 public that the agency understands its obligation to refrain from further such discriminatory  
6 conduct. As Attorney General Sessions acknowledged in this regard, "[t]here is no excuse  
7 for [the IRS's] conduct," as it is "without question" that the First Amendment prohibits the  
8 conduct that occurred here, i.e., subjecting American citizens to disparate treatment "based  
9 solely on their viewpoint or ideology." Sessions further confirmed his Department's  
10 commitment to ensuring that the "abuse of power" in which the IRS engaged here "will not  
11 be tolerated." It is impossible to overstate the importance of this victory.

12 This marks a years-long fight for justice in defense of the constitutional rights of the public.  
13 This is an extraordinary victory against abuse of power and corruption. It sends a powerful  
14 warning to the deep state bureaucracy that it will not be allowed to violate the Constitution  
15 and manipulate the IRS, SSA and other agencies in order to silence and shut down those  
16 who speak out about political corruption crimes. In the wake of Wisconsin Watchdog's  
17 investigation into SSA staff allegations of incompetence, misconduct, and retaliation in  
18 Social Security disability appeals offices, several employees have taken their complaints to a  
19 Senate committee led by Wisconsin Sen. Ron Johnson.

20  
21 An official with knowledge of the complaints said the Senate Homeland Security and  
22 Governmental Affairs Committee, chaired by the Oshkosh Republican, has received emails  
23 and other contacts from "certain people" inside the Social Security Administration's Office  
24 of Disability Adjudication and Review. The initial complaints came from an employee  
25 inside the Milwaukee office following Wisconsin Watchdog's opening investigative report  
26 that found some claimants waiting more than 1,000 days for an appeals decision on their  
27 disability benefits claim. Following Wednesday's story of a whistle-blower in the Madison  
28 ODAR office, the committee has received more specific complaints about retaliation against

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employees, the source said. Committee staff members sent the latest Watchdog piece to SSA administrators hoping they will “cooperate,” the source said. To date, the agency has been less than cooperative. “This is an ongoing process, and they are not always as forthcoming as we’d like them to be,” the source said. “Hopefully with your continued reporting, this is an issue they can’t duck.” A Senate committee member said officials there are working with the Office of Special Counsel on “multiple whistle-blower retaliation claims.” The committee continues to request information from the SSA. The whistle-blower in the Madison office claims management retaliated against her after she was called to testify in a misconduct case.

The incident involved “inappropriate behavior” by an administrative law judge, she said. “They are so corrupt. It’s absolutely horrible,” said the woman, a lead case technician in the Madison Office of Disability Adjudication and Review. She spoke on condition of anonymity, fearing more retribution from her supervisors. While she said recounting her particular experiences will more than likely betray her identity anyway, the ODAR case worker insisted she has had enough. “I’m at point where they don’t care about me, I don’t see why I’m protecting them. This is my last resort,” she said. “I want to do my work without fear of retaliation.” She said she has contacted the Senate committee. “I forwarded my information to them and I got an email back from them. See these reports:

- [WSJ: 131 Federal Judges Broke Law by Hearing Cases Where They Had Financial Interest...](#)

[\*\*Dirty profits from bench...\*\*](#)

<https://www.wsj.com/articles/hidden-interest-judges-financial-conflicts-graphic-11632834079>

<https://www.wsj.com/articles/131-federal-judges-broke-the-law-by-hearing-cases-where-they-had-a-financial-interest-11632834421>

- They said people are coming out of the woodwork with their complaints (about ODAR) following your story,” the whistle-blower said. Ronald Klym, a long-time senior legal

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1 assistant in the Milwaukee ODAR office, alleges he has been retaliated against by  
2 supervisors for going public with his charges of incompetence and misconduct in the  
3 agency. The federal employee, who has worked for SSA for 16 years, provided Wisconsin  
4 Watchdog with documents showing extremely long wait times for claimants appealing their  
5 denied applications for benefits. Doug Nguyen, SSA regional spokesman, in a previous story  
6 said the agency acknowledges that Milwaukee ODAR has a "high average processing time  
7 for disability appeal hearings, and we are working to address the issue." Beyond the delays  
8 is what Klym calls the "shell game," the wholesale transferring of cases to other parts of the  
9 country by administrators to make the Milwaukee office's numbers look better than they are.  
10 The Madison office whistle-blower confirmed Klym's allegations, saying at one point she  
11 saw 2,000 cases from the Milwaukee office handed off to the Oak Brook operation. There  
12 are over 10,000 SSA disability manipulation charges against SSA executives and staff.

**- BLACKLISTING:**

14 Government officials and tech oligarchs contacted members of the National Venture Capital  
15 association (NVCA) and created national "black-lists" to blockade Plaintiffs from receiving  
16 investor funding. This was also confirmed in a widely published disclosure by Tesla Motors  
17 Daryl Siry and in published testimony. If Silicon Valley political campaign finance oligarchs  
18 black-list you (see the "AngelGate" Scandal and the "High Tech No Poaching Class Action  
19 Lawsuit" cases) you will never get investor funding again.

**- FOIA OBFUSCATION:**

21 Federal FOIA requests were hidden, frozen, stone-walled, delayed, lied about and only  
22 partially responded to in order to seek to hide information and run cover-ups. In once  
23 instance, even though GOVT FOIA staff had the requested FOIA files in their top desk  
24 drawers, they delayed handing the FOIA copies over for nearly a decade in order to run a  
25 cover-up.

**- ARBITRARY DEADLINE MANIPULATION:**

27 Crony state and federal officials play an endless game of Catch-22 by arbitrarily determining  
28 that deadlines had passed that they, the government officials, had stonewalled and

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1 obfuscated applications for, in order to force these deadlines that they set, to appear to be  
2 missed.

3 **- POLITICAL POISONING & TOXIC EXPOSURE:**

4 Plaintiffs were found to be strangely poisoned, not unlike the Alexander Litvenko case, The  
5 Salisbury Case and hundreds of other political poisoning cases. Heavy metals and toxic  
6 materials were found right after Plaintiffs work with The U.S. Government weapons and  
7 energy facilities. Many wonder if Plaintiffs was intentionally exposed to toxins in retribution  
8 for their testimony. The federal MSDS documents clearly show that a number of Plaintiffs  
9 were exposed to deadly compounds and radiations, via GOVT, without being provided with  
10 proper HazMat suits which GOVT officials knew were required.

11 **- WORKPLACE SABOTAGE AND OBSTRUCTION:**

12 Plaintiffs employers were called, and faxed, and ordered to fire target Plaintiffs from their  
13 places of employment, in the middle of the day, with no notice, as a retribution tactic.

14 **- MEDIA ASSASSINATION PROGRAMS:**

15 On orders from Obama White House officials Google, YouTube, Gawker Media and  
16 Gizmodo Media produced attack articles. Google locked these contrived attack articles from  
17 the Nicholas Guido Denton tabloid empire on the top line, of the front page of all Google  
18 searches for a decade in front of 7.5 billion people, around the world. This attack-type uses  
19 over \$40 million dollars in server farms, production costs and internet rigging. The forensic  
20 data acquired from tracking some of these attacks proves that Google rigged these attacks  
21 against Plaintiffs on the internet and that all of Google's "impressions" are manually  
22 controlled by Google's executives who are also the main financiers and policy directors of  
23 the Obama Administration. This data was provided to the European Union for it's ongoing  
24 prosecution of Google's political manipulation of public perceptions. Hired attackers  
25 Nicholas Guido Denton, John Herman, Adrian Covert, Ian Fette, Patrick George, Gabrielle  
26 Darbyshire and John Cook have been referred to the FBI for surveillance, tracking and  
27 interview relative to the command, control and compensation for those attacks.

28 **- COMMERCIAL EMPLOYMENT DATABASE POISONING AND RED-**

**FLAGGING:**

Plaintiffs HR and employment records, on Taleo, Palantir and EVERY recruiting and hiring database, was embedded with negative keywords and “flags” in order to prevent the Plaintiffs from ever gaining future employment.

**- ATTEMPTS ON THE LIVES OF WHISTLE-BLOWERS:**

Gary D. Conley, Seth Rich, Rajeev Motwani who Plaintiffs knew, and many other whistle-blowers in these matters, turned up dead under strange circumstances. Plaintiffs have received ongoing death threats for his help to federal investigations in the larger organized crime investigation relative to this matter. See the list of over 120 dead victims, lower down in this document, 1/3 of whom worked with Plaintiffs and were threatened in advance of their deaths.

**- REVENUE BLOCKADES AND INTERNET INCOME RE-DIRECTION:**

Paypal (A DNC-biased operation owned and operated by White House political campaign financiers) and other on-line payments for on-line sales by Plaintiffs are de-platformed, delayed, hidden, or re-directed in order to terminate income potential for target who competed with the attackers interests and holdings. This further denied Plaintiffs income. As a test, Plaintiffs built an online store with hundreds of thousands of products and marketed it globally. Trackers, placed by Plaintiffs technicians, on servers, discovered that Paypal and an outside “Virginia-based system” were DNS and payment re-directed all traffic away from the store so that Plaintiffs received no traffic and no income. In DNS redirection, "website spoofing" sends target Plaintiffs websites to dead ends where no sales orders or customer inquiries actually get back to the target. These internet revenue activity manipulations are conducted using outside covert servers operated by the attackers and revealed in the Snowden Leaks. All commercial storefronts and on-line sales attempts by target Plaintiffs, had their sites hidden, or search engine de-linked by a massively resourced facility located in Virginia, Texas or Palo Alto, California in order to terminate revenue potentials for the Plaintiffs.

**- TROLL FARM DEPLOYMENTS:**



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1 Contracted trolls, shills, botnets and synth-blog deployments are deployed to place  
2 defamatory statements and disinformation about Plaintiffs in front of 7.5 billion people  
3 around the world on the internet in order to seek to damage their federal testimony  
4 credibility by a massively resourced facility. Some of these troll farms were uncovered in  
5 Russia, Ukraine, Israel and Brazil. Renown author Farrow writes about this technique in his  
6 book: *“Catch And Kill”*.

7 **- FUSION GPS, MEDIA MATTERS BRAND “KILL” CONTRACTS:**

8 Campaign finance dirty tricks contractors were hired by campaign financiers to attack the  
9 friends and family members of the target Plaintiffs in order to create low morale for the  
10 target Plaintiffs psyche and motivation.

11 **- MANUAL SEARCH ENGINE LOCK-IN ATTACKS:**

12 In one case covert political partner: Google, transferred large sums of cash to dirty tricks  
13 contractors and then manually locked the media portion of the attacks into the top lines of  
14 the top pages of all Google searches globally, for years, with hidden embedded codes in the  
15 links and web-pages which multiplied the attacks on Plaintiffs by many magnitudes.

16 **- U.S. PATENT OFFICE MANIPULATION TO BLOCKADE REVENUE:**

17 Covert Cartel financier: Google, placed Google’s lawyer: Michelle Lee, in charge of the  
18 U.S. Patent Office and she, in turn, stacked all of the U.S. Patent Office IPR and ALICE  
19 review boards and offices with Google-supporting employees in order to rig the U.S. Patent  
20 Office to protect Google from being prosecuted for the vast patent thefts that Google  
21 engages in. Google has hundreds of patent lawsuits for technology theft and a number of  
22 those lawsuits refer to Google’s operations as “Racketeering”, “Monopolistic Cartel” and  
23 “Government Coup-like” behaviors. Thousands of articles and investigations detail the fact  
24 that Google, “essentially” ran the Obama White House and provided over 80% of the key  
25 White House staff. A conflict-of-interest unlike any in American history. Google’s investors  
26 personally told Plaintiffs they would “kill him”. Google and the Obama Administration were  
27 “the same entity”. Plaintiffs testified in the review that got Michelle Lee terminated and  
28 uncovered a tactical political and social warfare group inside Google who were financed by

1 Federal and State funds. For additional proof, SEE THE VIDEO at:

2 [http://focus-book.com/public/The\\_Battle\\_to\\_Save\\_Inventing.m4v](http://focus-book.com/public/The_Battle_to_Save_Inventing.m4v)

3 or

4 [http://newsplus007.com/public/The\\_Battle\\_to\\_Save\\_Inventing.m4v](http://newsplus007.com/public/The_Battle_to_Save_Inventing.m4v)

5 Silicon Valley has taken over the U.S. Patent Office with lobbyists and influence payments.

6 Per Randy Landreneau, the President the U.S. Inventor guild: “ *Independence Day is that*

7 *special time when we Americans remember and celebrate our country's freedom. While it*

8 *may mean different things to many people, suffice to say, it is the reason we are Free, we*

9 *have Liberty.* Founder, writer, statesman and inventor Benjamin Franklin wrote, "On

10 Historical occasions, Questions of Right and Wrong, Justice and Injustice, will naturally

11 arise." Here, on this honored day, we take a quick look at Invention and our Independence.

12 Towards the beginning of the Declaration of Independence, whose principal author was our

13 eventual third president, Thomas Jefferson, the very purpose of our Founders' quest was

14 established. It is stated: "We hold these truths to be self-evident, that all men are created

15 equal, that they are endowed by their Creator with certain unalienable Rights, that among

16 these are Life, Liberty and the pursuit of Happiness." These were men and women of

17 incredible vision, of intense courage, and they succeeded in accomplishing their seemingly

18 insurmountable task, rising up and defeating perhaps the most powerful global Empire of the

19 time, Great Britain. The United States of America eventually became the beacon of hope

20 and individual freedom around the world. People from virtually every land came to this

21 country to seek the American Dream, which ideals include individual and property rights,

22 religious freedom, liberty, equality and the opportunity for upward mobility, achieved

23 through dedication and hard work. One of the reasons America became the world leader in

24 nearly all categories is due, in no small part, to how our Founders recognized and

25 encouraged invention and innovation. They understood what builders, creators and designers

26 could mean to a small, fledgling country with such a noble purpose. After declaring our

27 independence and fighting a long and bloody war to establish it, our Founders gathered once

28 again in Philadelphia for the Constitutional Convention to form a government that would

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1 embody those ideals embodied in our Declaration of Independence. The Father of our  
2 Constitution and eventual fourth President, James Madison wrote, in Federalist 43 (January  
3 23, 1788): "A power 'to promote the progress of science and useful arts, by securing, for a  
4 limited time, to authors and inventors, the exclusive right to their respective writings and  
5 discoveries.' "The utility of this power will scarcely be questioned. The copyright of authors  
6 has been solemnly adjudged, in Great Britain, to be a right of common law. The right to  
7 useful inventions seems with equal reason to belong to the inventors. The public good fully  
8 coincides in both cases with the claims of individuals. The States cannot separately make  
9 effectual provisions for either of the cases, and most of them have anticipated the decision of  
10 this point, by laws passed at the instance of Congress." Thus, within our U.S. Constitution is  
11 that short item, located in Article I Section 8 as Clause 8: "To promote the Progress of  
12 Science and useful Arts, by securing for limited Times to Authors and Inventors the  
13 exclusive Right to their respective Writings and Discoveries." That clause is, in reality, a  
14 significant and powerful part of the American Dream, allowing people from all walks of life  
15 who have a bright and useful idea to capitalize on their innovations and creations. For more  
16 than two centuries that which our Founders established for inventors and patent holders held  
17 true, for the most part. However, the biggest blow to true Independence for Inventors came  
18 with passage of the America Invents Act of 2011 (AIA). Due to ambiguous language and  
19 loopholes in that piece of legislation, multinational conglomerates and Big Tech have all but  
20 wiped out what our Founders had set up, which they hoped would endure - patent holder  
21 property rights. When any form of poor legislation is passed and enacted we are reminded of  
22 what Samuel Adams, Sons of Liberty founder and a leader of the Boston Tea Party, said;  
23 "The grand end of civil government, from the very nature of its institution, is for the support,  
24 protection, and defense of those very rights; the principal of which, as is before observed,  
25 are Life, Liberty, and Property."

26 Indeed, Jefferson states it quite succinctly, "Our legislators are not sufficiently apprized of  
27 the rightful limits of their power; that their true office is to declare and enforce only our  
28 natural rights and duties, and to take none of them from us." Madison adds to that, "A

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1 Government is instituted to protect property of every sort...This being the end of  
2 government, that alone is a just government, which impartially secures to every man,  
3 whatever is his own." As we celebrate Independence Day, and all that our Founders  
4 provided for our great country, we at US Inventor are working to correct the wrongs and  
5 injustices that have befallen inventors, particularly since the AIA was enacted, by  
6 revitalizing the spirit of our Declaration of Independence ("...Life, Liberty and the pursuit of  
7 Happiness.") through restoration of patent rights and protection as guaranteed in Article I  
8 Section 8 Clause 8 of our United States Constitution ("securing, for a limited time, to ...  
9 inventors, the exclusive right to their respective ... discoveries."). We will not rest until the  
10 rights of inventors have been restored. We're gaining ground, but our enemies are powerful.  
11 We need your help in forwarding our cause and becoming involved when it matters. This  
12 isn't just for us, it's for our children, our grandchildren, and the future existence of the  
13 American Dream."

14 Silicon Valley oligarchs have spent billions of dollars to put their people inside the United  
15 States Patent Office and to manipulate patent rulings in order to harm WITNESS and his  
16 peers for the purposes of: 1.) cheating instead of competing by stealing technologies and not  
17 paying for them and, 2.) operating reprisal, vendetta, retaliation campaigns against  
18 competitors and political enemies.

19 **- HONEY-TRAPS:**

20 "Honeytraps" and moles were employed by the attackers. In this tactic, people who covertly  
21 worked for the attackers were employed to approach the "target" in order to spy on and  
22 misdirect the subject. Match.com and other dating sites are owned by famous politicians and  
23 election campaign financier involved with Jeffrey Epstein and those sites were used to  
24 source girls for Epstein and Honey-traps to lure political adversaries.

25 **- FAKE NEWS TABLOID EMPIRE CREATED JUST FOR DEFAMATION**  
26 **ATTACKS:**

27 Gawker Media, Gizmodo Media, Snopes, SPLC and other hired media assassins were  
28 retained to produce "hatchet job" character assassination articles about Plaintiffs. Then those

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1 articles were faxed, mailed and emailed to Kaiser Permanente and investors with a note  
2 saying: "You don't want to have anything to do with this person, do you..?" in order to get  
3 Plaintiffs fired from their job and get Plaintiffs loans or financing pulled. The attackers use  
4 their round one attack media, that they authored, to create a round two second wave attack  
5 designed to end Plaintiffs life status via economic warfare.

6 **- HOUSING BLOCKADES:**

7 Mortgage and rental applications had red flags added to them in databases to prevent the  
8 targets from getting homes or apartments.

9 **- HACKING OF Plaintiffs DEVICES:**

10 Krebs On Security, Wired, Ars Technica, The Wall Street Journal and most major IT  
11 publications have reported that hundreds of spy "back-doors" have been found on every  
12 Intel, AMD, Apple, Xfinity, Cisco, Microsoft, Juniper Networks motherboard, chip-set and  
13 hardware component set. This means that the attackers used a "key" code can open any of  
14 Plaintiffs computer, server, router, cloud-network or other network connected device and  
15 read every file, photo, video, your calendar and email on devices at any time from any  
16 location on Earth. This has been widely reported on by Glenn Greenwald, Edward Snowden,  
17 Scahill, Cheryl K of CBS News and others. Plaintiffs was hacked at least 10 times. In a  
18 number of instances, people, who Plaintiffs had been communicating with online, were  
19 mysteriously contacted by a third party who sent them the Gizmodo attack article or phoned  
20 them with warnings to avoid Plaintiffs. These kinds of Man-In-The-Middle interceptions  
21 would only have been possible from hacking and MITM surveillance tactics.

22 **- TECH INDUSTRY BLACK-LIST COORDINATION:**

23 McCarthy-Era "Black-lists" were created and employed against target Plaintiffs who  
24 competed with Obama Administration executives and their campaign financiers to prevent  
25 them from getting funding and future employment. This White House process is known as  
26 "RatFucking", a tactic that is documented in a variety of published reports and on  
27 Wikipedia. Using Gust, Google Docs, Dropbox and secret meetings, a black-list has been  
28 maintained to attack Plaintiffs for whistle-blowing.

**- HUD AND USDA MORTGAGE RIGHTS BLOCKADES:**

The housing rights of Plaintiffs were stalled in reprisal. Public records show that tens of thousands of other Plaintiffs were moved ahead of Plaintiffs even though Plaintiffs validation metrics exceeded those of almost every other Plaintiffs. Plaintiffs was “black-listed”.

135. Additional ‘dirty tricks’ efforts were used per:  
<https://www.justice-integrity.org/634-intelligence-agencies-use-social-media-for-dirty-tricks-propaganda-new-report>
136. <https://www.commondreams.org/news/2014/02/07/gchqs-dirty-tricks-revealed-false-flags-virus-attacks-and-honey-traps>
137. <https://theintercept.com/2014/02/24/jtrig-manipulation/>
138. [https://www.salon.com/2011/02/11/threats\\_against\\_glenn\\_greenwald\\_wikileaks/](https://www.salon.com/2011/02/11/threats_against_glenn_greenwald_wikileaks/)
139. <https://www.theguardian.com/commentisfree/2013/jun/24/surveillance-us-national-security>
140. <https://www.straight.com/news/482846/government-trolls-use-psychology-based-influence-techniques-social-media>
141. [http://federal-report.com/public/The\\_Political\\_Reprisal\\_Vendetta\\_Playbook.pdf](http://federal-report.com/public/The_Political_Reprisal_Vendetta_Playbook.pdf)
142. <https://thedailybanter.com/2014/02/05/greenwalds-latest-snowden-revelation-the-british-gchq-is-waging-war-on-hackers/>
143. <https://www.cia.gov/library/readingroom/docs/CIA-RDP89-01258R000100010002-4.pdf>
144. ...and thousands of additional reports proving the attacker assertions.
- 145.

### EXHIBIT 3 - An Overview Of The Cover-Up

These documents have been provided to The FBI – (C. Wray, P. Cair, Bennett, J. Comey, D. Johnson & the IG, et al); The DOJ – (Merrick, S. Hinds, E. Holder, S. Winslow, M. Lo, W. Garbers & the IG, et al), The CFTC – Executive offices), The U.S. Inspector General, The GAO (fraudnet, The IG, et al), The FCC (The IG), The FEC – (The IG), The SEC – (Charman, SF office, et al), The OGE (The IG), The U.S. Attorney General, The OSC – (Alexander, et al), The DOE – (Secty, The IG, et al), The FTC (The IG, Chairman, et al) CONGRESSIONAL ETHICS OFFICES - (Filing Secty, and Senior Members) ; The SSA – (Human Rights Complaints Office, The IG, et al); SPECIAL COUNSEL JOHN W. HUBER – (J. Huber, DOJ-IG) – SENATE COMMERCE COMMITTEE – (Filing Secty) SPECIAL COUNSEL JOHN DURHAM - (J. Durham, DOJ-IG, et al) and related law enforcement and regulatory agencies.

We have contacted all law enforcement and regulatory agencies about this matter. Field agents have informed us that their bosses have ordered them to stone-wall this case, to avoid writing '302 reports' (because Congress can see them) and to finger point the matter off to "other agencies" in order to avoid political embarrassment and administrative shame. Such obfuscation is illegal at a felony-level and at a Constitutional law level.

We are now copying these papers to 1.) every member of Congress, 2.) every law enforcement and regulatory agency in the U.S.A. and EU, over 5000 investigative journalists and every American citizen.

We saw the highest level government officials manipulate government process and Treasury funds in order to payola themselves, and their friends, and harm their business competitors. We saw government officials manufacture crisis “stimulus” money for their own pockets!

Senior government officials defrauded us in an energy industry stock market scam, and, in partnership with their Silicon Valley tech financiers, engaged in a RICO law violating organized



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1 criminal 'enterprise' and also ran over \$30 million of Fusion GPS/Black Cube/Gawker-Gizmodo-  
2 Google attacks against us (Proven by their financial records). The attackers used government  
3 resources, agency staff and government funds. They sought to terminally harm us in retaliation for  
4 competing with Defendants (Defendants = government officials and their Silicon valley oligarch  
5 financiers) and for assisting police with investigations of Defendants. Herein, and via referenced  
6 Congressional and Inspector General investigations, we have provided proof of over 1000 instances  
7 of government officials running retaliation attacks and engaging in an organized pattern of criminal  
8 activity via an organized 'enterprise' as defined by RICO and anti-trust laws.

9 We have personally known many of these politicians, their families and their Silicon Valley  
10 financiers since College days. The Defendants invited some of us into their criminal scheme but we  
11 chose to assist law enforcement and public justice instead.

12 While the government is planning to give \$450,000.00 to each illegal immigrant, ((  
13 [https://www.washingtonexaminer.com/news/biden-administration-weighing-450k-a-person-](https://www.washingtonexaminer.com/news/biden-administration-weighing-450k-a-person-compensation-to-migrant-families-separated-by-trump)  
14 [compensation-to-migrant-families-separated-by-trump](https://www.washingtonexaminer.com/news/biden-administration-weighing-450k-a-person-compensation-to-migrant-families-separated-by-trump) ); that same government is with-holding  
15 millions of dollars from us, who saved the government billions of dollars. That same government  
16 hired Fusion GPS, Black Cube, Perkins Coie, Gawker, Gizmodo and other attack services to destroy  
17 us according to federal investigators. We have demanded compensation, back-owed monies and  
18 recovery of our losses. Government agencies responsible for correcting the situation are engaging in  
19 cover-ups and stone-walling. That is why we are forced to release the "whole story".

20 We have provided the details in electronic evidence repositories as well as a list of public  
21 officials we have reported to who have failed to take action, been non-responsive and who have  
22 operated a cover-up of this matter.

23 Senior government officials defrauded us in an energy industry stock market scam, and, in  
24 partnership with their Silicon Valley tech financiers, engaged in a RICO law violating organized  
25 criminal 'enterprise' and also ran over \$30 million of Fusion GPS/Black Cube/Gawker-Gizmodo-  
26 Google attacks against us, their competitors and whistle-blowers. The attackers used government  
27 resources, agency staff and government funds. They sought to terminally harm us in retaliation for  
28 competing with Defendants and for assisting police with investigations of Defendants. Herein, and

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1 via referenced Congressional and Inspector General investigations, we have provided proof of **over**  
2 1000 instances of government officials running retaliation attacks and engaging in an organized  
3 pattern of criminal activity via an organized '*enterprise*' as defined by RICO and anti-trust laws.

4 From the OPM and Congressional staff we acquired a list of every person who worked at  
5 The White House and the Department of Energy during the periods in question. We then used  
6 forensic databases and securities industry resources to see which ones owned stock, job promises  
7 and conflict-of-interest assets in our competitors and adversaries. So far, we have not found A  
8 SINGLE ONE of those people who did not have a major conflict-of-interest. We encourage the  
9 public and the press to conduct the same examination, independently, and to have the FBI, The  
10 GAO, DOJ, ICIJ and ProPublica check their work. When you 'follow-the-money', the crimes and  
11 the criminals are obvious!

12 **The materials in the referenced documents cover:**

- 13 - The historical background of the perpetrators and their political and business Cartel  
14 actions.
- 15 - Our first-hand interactions with the perpetrators.
- 16 - Related cases and charges against perpetrators by other parties and agencies.
- 17 - The covert financial profit administration/beneficiary web disclosed by ICIJ and federal agency  
18 investigations.
- 19 - The reprisal attacks against us financed, commanded and controlled by the perpetrators.
- 20 - The cover-up, black-listing, stone-walling and obfuscation tactics deployed by major public  
21 officials in order to delay justice in this case.
- 22 - The manipulation of public funds and agencies for the unjust gain of the referenced Cartel and it's  
23 perpetrator/members at the expense of the public.
- 24 - The 'convenient' deaths of a surprising number of individuals involved in this matter.
- 25 - Billions of dollars of political campaign financing deployed by the Defendants in national and  
26 regional elections.
- 27 - Personal communications between White House staff and government agencies.
- 28 - Trillions of dollars of energy industry and media industry profiteering and stock market

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1 manipulations.

2 - Billions of dollars of high tech and automobile market anti-trust law violations.

3 Government officials engaged in monopolistic, market-rigging, blacklist-based crimes  
4 which harmed us. Then those officials operated spy-agency-type retaliation/reprisal/revenge attacks  
5 against us in retaliation for: 1.) reporting those crimes, 2.) competing with defendants, and 3.)  
6 assisting in the investigation of those crimes.

7 Every public official who attacked us: A.) held stock and assets in our competitors, B.) was  
8 compensated by our competitors, C.) was a member of organizations who paid news, internet and  
9 information services to manipulate their output for their own unjust gain, D.) knew that their  
10 malicious assertions were false and defamatory, and E.) and otherwise met the legal means test to  
11 qualify as violators of federal RICO laws, Human Rights laws, Civil Rights standards and related  
12 State and Federal Constitutional rights laws.

13 By rigging HUD, SSA, DOE, and other public benefits determinations, to harm the funding,  
14 payments, witness fees, informant fees, whistle-blower awards and stock market profits of  
15 adversaries, the Defendants engaged in felony crime. The purpose of a RICO case against the  
16 Defendants should be to cripple the whole crime organization via numerous charges, which shall  
17 be brought against multiple defendants, under multiple liability, which means that prosecutors will  
18 find the underlying elements of of these acts and then have conspiracy on top of it, and then each  
19 and *every charge* against the perpetrators is *separate* and runs *consecutively* .

20 For example when Elon Musk is charged with bribery and conspiracy that charge may have  
21 led to 10-15 years in prison in the *old days*, now under RICO, when found guilty of racketeering he  
22 can be fined up to \$25,000 and and sentenced to 20 years in prison per *each* of many racketeering  
23 counts.

24 RICO charges, as part of the charge set, will make these *convictions easier*. In many cases,  
25 the threat of a RICO indictment *can force these defendants to plead guilty* to lesser charges, in part  
26 because the seizure of their assets would make it difficult to pay a defense attorney for a case this  
27 large. Racketeering and RICO-related crimes are grave and *require* skilled defense, that is prepared  
28 to face the government-assembled legal teams in federal court. *Essentially, "it means the convicted*

would never see the light of day again, they are never getting out. “

Despite its harsh provisions, these RICO-related charges are easy to prove in court, as they focus on patterns of behavior as opposed to criminal acts. The government officials and their tech oligarch partners were audacious in publicly promoting their crimes and their above-the-law attitudes. RICO, here, also permits a private individual “*damaged in his business or property*” by a “*racketeer*” to file a civil suit. The government should, thus, join with us in this case.

We have proven the existence of an illegal “*enterprise*“., per the FTC and DOJ legal meaning of that term.

The defendant(s) are *not* the enterprise; in other words, the *defendant(s)* and the *enterprise* are *not* one and the same.

The defendant(s) meet the construct of four specified relationships:

1. the defendant(s) and the enterprise: either the defendant(s) invested the proceeds of the pattern of racketeering activity into the enterprise;

2. the defendant(s) acquired or maintained an interest in, or control of, the enterprise through the pattern of racketeering activity;

3. the defendant(s) conducted or participated in the affairs of the enterprise “through” the pattern of racketeering activity ;

4. the defendant(s) conspired to do all of the above crimes.

The enterprise, herein, is the ‘prize,’ ‘instrument,’ ‘victim,’ or ‘perpetrator’ of the racketeers. A civil RICO action for this matter should be filed in state AND federal court.

We intend that both the *criminal* and *civil* components will allow the recovery of treble damages (damages in *triple* the amount of actual/compensatory damages) for Plaintiffs.

Our evidence has focused on *patterns of behavior* AND *criminal acts*.

We seek multiple liability (charges brought against multiple defendants, which means if prosecutors now find the underlying elements of of these acts, you have conspiracy on top of it)

Each and every *charge* against defendants is *separate* and runs *consecutively*. *Admissible* hearsay evidence is offered in this case. Associative evidence is allowed ( *guilt by association* meaning if a defendant profited off the crimes of an organization even if he was not directly

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involved with the crime himself he shall still be charged as a co-conspirator and go *all the way* up the chain of command). This case structure will incentivize the operatives (soldati) at the corrupt law firms, CPA's, lobbyists and media outlets to flip, or roll-over, on the bosses.

This case structure allows both the government and ourselves to engage in substantial asset seizure. The owners of the racketeering shell corporations, real estate scams and trusts are well-known to often abscond with the assets. An injunction and/or performance bond ensures that there is something to *seize* in the event of a *guilty verdict*. In addition, the racketeers must *forfeit all* ill-gotten gains and interest in any business gained through a pattern of "*racketeering activity*." Over 1000 false-front shells, trusts, dark money and PAC assets are known to be held by the defendants.

The attackers hired, paid, commanded and controlled the attack services: Gawker Media, Gizmodo Media, Google, YouTube, Media Matters, Black Box, Fusion GPS, Black Cube, PsyOps, Shareblue, and other brands, and used them to operate retaliation attacks against us and to manipulate government agency procedures against us in revenge/reprisal procedures. An investor group, which included us, with support from Congress, ***sued the Department of Energy for corruption and won.***

In the course of that case The Secretary of Energy, The U.S. Attorney General, The Director of the FBI and over 100 other federal employees were fired for cronyism, corruption and insider trading.

The Defendants have been proven to have received bribes from our competitors. For example: the most senior officials in The U.S. Government are the worshipers of Elon Musk, investor's in Elon Musk's companies and suppliers, deciders of the financing for Elon Musk, suppliers of staffing to Elon Musk, recipients of political campaign financing by Elon Musk and Musk's covert Google And Facebook partnership, social friends of Elon Musk and the attackers of Elon Musk's competitors. We demand damages payments and monies owed.

**The main issues herein include:**

- 1.) The creation and operation of the disclosed organized crime entity involving public figures
- 2.) The methods and tactics of the bribery they employed using the stock market

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3.) The attacks they operated against whistle-blowers and competitors using government resources, black-listing, funds blockades and dirty tricks services.

4.) The systemized sex trafficking and employee abuse protection scheme they operate

5.) The industrialization of political payola that they enforce using corrupt contracted services and former intelligence agency operatives

6.) Their coordinated violations of free speech and their systemized control of all digital news and information

7.) The harms to the public that they caused

8.) Judges and regulators who reviewed this case who owned the culprits companies:

<https://www.dailymail.co.uk/news/article-10038643/131-federal-judges-broke-law-hearing-cases-involving-companies-financial-in.html>

**We have disclosed:** Retaliation, discrimination, abuse of process; FTCA violations; account stated; breach of contract; conversion; defamation; fraudulent misrepresentation; fraudulent concealment; injurious falsehood, product disparagement and trade libel; civil rights violations and violations of the U.S. Constitution; misappropriation of trade secrets; prima facie tort; quantum meruit; tortious interference including a.) Tortious interference with an existing contract, b.) Tortious interference with prospective, c.) Tortious interference with business relations contractual relations; patent infringement; personal injury; unjust enrichment; anti-trust law violations; labor law violations and related causes engaged in by the perpetrators.

***The perpetrators include White House*** officials and their staff, contractors and employees; ***United States Senators*** and their staff, contractors and employees; ***Department Of Energy*** officials and their staff, contractors and employees; ***Department of Justice*** officials and their staff, contractors and employees; ***Social Security Administration*** officials and their staff, contractors and employees; ***National Highway And Transportation Administration*** officials and their staff, contractors and employees; and, ***Other government agencies*** and their staff, contractors and employees as DOES 1 through 20 as proven by their leaked emails, Congressional and FBI

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1 investigation records, eye-witness testimony, their banking and stock market records and  
2 recordings. Thus, it is impossible for any agency to say that this is not their concern or jurisdiction.

3  
4 Those of us damaged the the actions of these public officials claim for offsets from corrupt  
5 acts and collusion by government employees and contractors, all of whom engaged in said acts in  
6 order to acquire unjust gain with their stock market holdings and other hidden compensation routes.  
7 All other whistle-blowers and victims are on public, and court record, receiving between  
8 \$300,000.00 and \$150,000,000.00 with an average award of \$25,000,000.00.

9 Our demand includes removal of SSA blockades of funds, removal of blockades of  
10 payments, payments for damages, removal of informant fee blockades, removal of our whistle-  
11 blower fee blockades, payment of back-monies owed, payment for income loss, payment for stock  
12 market insider trading interference by public officials losses and related costs based on court-record  
13 historical precedents and GAAP historical comparative records of competitors who benefited at our  
14 expense via covert relationships with public officials.



**EXHIBIT 4 - Public News Coverage Context Of These Crimes And Corruption Activities:**

You have heard about this case in the news. Here is some of the main-stream news coverage of it:

Joshua Comins disclosed how Nancy Pelosi's financial dealings gave her \$315 million in assets on just a government salary. Organized crime is suspected. If Bay Area politicians get mad at a constituent they can have that constituent "erased" from SSA, HUD and pension benefits, black-listed, media-attacked and utterly destroyed.

Where's the politician's 'dirty money' money coming from?, everyone is asking.

House Speaker Nancy Pelosi, D-Calif., has served in Congress for nearly 34 years and presently presides in a top-tier position as one of the most powerful figures in The U.S. Government

Speaker was unable to pass the bipartisan infrastructure bill as progressives in her own party signaled their disapproval. Many have condemned her policies, saying they're making it "harder and harder for average Americans to accumulate wealth," shackling them with taxes and "destroying the dollar with reckless spending."

The current salary of a Speaker of the House sits in the low six-figures, yet Pelosi is one of the richest members of Congress.

So what is her secret: "It appears to be her husband, Paul."

"After they got married, Paul opened up a real estate and venture capital firm. Through his connections, he pushed Nancy into the political world, helping her get elected to Congress in 1987,". This is just like how Dianne Feinstein and Richard Blum hooked up their own deal.

The couple has timed the market and insider trading perfectly over the years while Nancy's been a Washington insider. With real estate and stocks, the Pelosis always know what the right investment is based on her lobbyist deals. The Pelosis own several pieces of real estate including a mansion in Napa Valley valued up to \$25 million, a DC waterfront condo worth over \$2 million, and a red brick mansion in California's Pacific Heights.

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1 Her husband owns commercial properties in San Francisco "combined, worth up to \$50  
2 million.

3 In 2018, the Pelosis' wealth has skyrocketed. That year, her financial disclosure report  
4 revealed a net worth of over \$114 million. In 2019, Pelosi's assets total up to a whopping \$271  
5 million and in 2020, those numbers went up even more to as high as \$315 million.

6 In 2007, Visa worried the new Democrat Congress would target their swipe fees, costing  
7 them billions. So they hired a team of lobbyists who descended on Pelosi. Visa's CEO personally  
8 met with her. She got donations from them. One of his advisers left and became a VISA lobbyist  
9 himself. Suddenly, Paul Pelosi got a phone call from his broker. He was in luck, Paul was offered a  
10 prescreen-ed invite to get in early on Visa's \$18 billion IPO. Did Nancy and her husband hesitate?  
11 No, they bought between \$1 million and \$5 million worth of Visa stock. But it gets better. While  
12 Pelosi was speaker, bills that would have hurt Visa's stock price were blocked in the House. Visa  
13 shares going up over 200 percent during the time, making the Pelosis a fortune on paper.

14 In January, the Pelosis got a million dollars worth of Tesla stock right before Joe Biden  
15 announced electric car incentives in June. The Pelosi family cashed in big time just before Congress  
16 was set to pounce on Big Tech. Mr. Pelosi exercised options on Google's parent company,  
17 Alphabet, making an easy \$5.3 million.

18 Pelosi, Harris, Feinstein, Google and George Soros own Elon Musk's companies. Could any  
19 competitor to Musk get a fair shake in commerce or government funding? Never!

20 In March, Paul Pelosi exercised \$2 million worth of Microsoft options, just two weeks  
21 before the tech giant got a \$22 billion contract to equip the US Army with high tech headsets. The  
22 Pelosis and the Feinsteins have never been indicted for insider trading, but her marriage investments  
23 and access, combined with extremely fortunate timing, have created a lot of suspicions.

24 FINCEN, GAO, FBI, ICIJ and private investigators are now following the money, and there  
25 sure is a lot of it. There are hundreds of suspected criminal dark money charges that have been  
26 pointed at San Francisco Bay Area politicians.

27 Speaking of COVER-UPS:

28 **1.) Simone Biles, The U.S. Olympic Gymnastics Team and Larry Nasser sex case , 2.)**

1 **The Jeffrey Epstein sex cult case, 3.) The Gov. Gretchen Whitmer kidnapping case, 4.) The 9/11**  
2 **families case, 5.) The Michael Sussmann cover-up, and hundreds of other cases prove that**  
3 government officials cover-up big crimes in order to avoid personal shame. The victims reported to  
4 the FBI, DOJ, GAO, FTC, SEC and Congress in a timely manner and got stonewalled, lied to,  
5 attacked and retaliated against simply because they reported a crime! **THIS CASE** is yet another  
6 such case where the crimes were reported long ago but because it involved famous rich people, it  
7 was covered up by public officials. With modern internet media, though, the truth always finally  
8 comes out. **As an analogy:** If you wanted to plan one of the largest crimes in history, you could use  
9 street 'Stop Signs', for example.

10  
11 You know that the government pays for all of the stop signs. You could have your friends buy all of  
12 the stop sign pole factories, stop sign bolt factories and red reflective paint factories in advance.  
13 You then bribe your politicians and fake news outlets to proclaim that there is a global crisis of  
14 people running stop signs and killing school children. You manufacture this "stop sign running  
15 crisis" that will "kill all of the children within 15 years" if we don't stop it. You claim that the stop  
16 sign running is "man made" and caused by your political opponents because they make whiskey and  
17 that causes stop sign running. You get your politicians to create a giant "stimulus" that ends up  
18 almost exclusively giving all of the stimulus money to you and your corrupt crony friends who own  
19 all of the stop sign pole factories, stop sign bolt factories and red reflective paint factories. There is  
20 no doubt that people run stop signs. The police data proves it. Is stop sign running the biggest crisis  
21 in the nation above Cancer, Housing, Drug Cartels, Political Bribery, Veterans Benefits, hmmm?

22  
23 The people who make yellow warning lights and other traffic control devices are cut-out of those  
24 funds because they are competitors to the insiders who own all of the stop sign pole factories, stop  
25 sign bolt factories and red reflective paint factories. You would hire Gawker, Google, Gizmodo,  
26 Fusion GPS, Black Cube, Media Matters, Cambridge Analytica, Shareblue, IN-Q-Tel and other  
27 attacker-for-hire services to kill those competitors and whistle-blowers exposing your crime.

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1 In the pretend "stimulus" the government treasury funds are used to payola your friends monopolies  
2 and cut all of their competitors. If you had done these "stimulus scams" in 2008 and 2021 and  
3 evaded paying taxes like Elon Musk did....you would have pulled off a trillion dollar crime with you  
4 and your friends.

5 FINCEN, The FBI and the GAO have proven that stock ownership by politicians creates  
6 non-contractible quid pro quo relations with firms like Tesla, Google, Facebook and Netflix. The  
7 ownership by US Congress members in these firms contributing to their election campaigns is  
8 higher than in non-contributors. This bias toward contributors depends on the financial incentives of  
9 politicians and the relation's value. Firms with a stronger ownership–contribution association  
10 receive more government contracts, cash and tax waivers, such as Elon Musk's record-breaking  
11 government payola. The financial gains from these contracts are economically large when  
12 politicians buy stocks in covert exchange for contributions to the politicians, via insider  
13 arrangements.

14 In the **“THE FACEBOOK/META FACE-PLANT”** matter, citizens are calling their elected  
15 officials and demanding that the Department of Defense and The Department Of Justice CUT-OFF  
16 **Facebook/WhatsApp/Instagram** from their global DNS servers until they answer to Congress for  
17 their crimes. This Silicon Valley social crime operation has been proven to be a national security  
18 risk, a threat to our youth, **a bribery operator** and a threat to society! The October 3, 2021 CBS  
19 News 60 Minutes story was only part of the facts about the Facebook social crimes. October 4, 2021  
20 was the first day in modern human history that the entire planet was freed from the social stain that  
21 is the Facebook empire. University data scientists and forensic internet analysts were able to  
22 compare traffic manipulations on Oct 1., 2021, by Facebook's web manipulation and privacy  
23 harvesting gang, to the "clean" internet that uniquely existed on Oct. 4, 2021. You can see the  
24 changes. You can see who was controlling what. You can see the fake user data stop...and start.  
25 Congressional Senate Commerce hearing finds that FACEBOOK operates exactly like a Mexican  
26 drug cartel run by 'El Zucko' pushing addictive media and messaging to kids and vulnerable  
27 citizens. FACEBOOK makes over one billion dollars, per day, for each day that they delay  
28 Congress from acting! This demonstrates the power that the referenced “Tech Cartel” has and their

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1 ability to “own” Congress.

2       Plaintiffs built and operated one of the first, if not THE first, online social networks not long  
3 after Mark Zuckerberg was born. This claim by Plaintiffs was affirmed in a federal hearing at the  
4 U.S. Patent Office, as the First-To-Invent and operate a social network online years before  
5 Facebook even existed.

6  
7 In actuality, when federal and private investigators traced the instigators and beneficiaries of some  
8 other notorious "crisis" things: they and their politicians turned out to all be the exact same handful  
9 of people who owned all of the exclusive "solutions" to the manufactured "crisis".

## EXHIBIT 5 – An Inconvenient Truth



**How Tesla Became a Trillion-Dollar Company Through Corruption, Bribery And Cronyism - Astonishing story about the rise of green technologies using political payola**

[By Ilya Pestov and The Justice Alliance](#)

After the news that Hertz [decided](#) to buy 100 000 Tesla cars for more than \$4 billion, Tesla capitalization has already increased almost by \$200 billion. I am not talking about the market irrationality anymore, but I feel a bit curious. Hertz has recently emerged from bankruptcy and [has not received](#) any wholesale discount from Musk. How and why is Hertz going to buy such expensive cars? The answer is simple — with taxpayers' money.

Apparently, the White House [has recently passed](#) the Budget Reconciliation Bill, which would cost \$1.75 trillion for US citizens. There are plenty of benefits for the so-called 'clean energy' in it, particularly, 30% of tax deductions for '[qualified commercial electric vehicles](#)'. It means that after buying Tesla cars Hertz will receive \$1.26 billion of tax cashback. In fact, there are

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1 also some benefits for the installing of electric vehicle charging stations. Hertz has already  
2 announced plans to make thousands of charging stations.

3 Lithium, Cobalt and rare earth mines are owned by Kleiner Perkins, Goldman Sachs and  
4 Department of Energy/White House insiders. That is what power's Elon Musk's cars. Many say that  
5 Tesla was just a front for invading foreign nations for their lithium batter mines (which are operated  
6 with child labor).

7 It is important to mention that common people have also an access to tax benefits that the  
8 public pays for with their April income taxes and the compensation limits [are increased](#) from \$7500  
9 to \$12 500. As an example, instead of paying \$15 000 income tax you may buy Tesla Model S and  
10 pay just \$2500. It is like a pretty bonus from Tesla or a good discount on electric vehicles. Seems to  
11 be a good motivation to refuse internal-combustion engines, doesn't it?

12 Moreover, Tesla also gets ZEV credits and other benefits for manufacturing its products.  
13 That way, the US government restructures the automotive market literally by hand and picks the  
14 winners and losers. Do you know what I find the most interesting in this story? The fact that the  
15 new bill [was published](#) on October, 28th but Hertz announced buying of Tesla cars on October,  
16 25th. As you can understand, the decision was made much earlier.

17 You may already know that Secretary of Energy Steven Chu, who gave Tesla their money,  
18 and his Silicon Valley friends at McKinsey Consulting, who provided the staff for the Department  
19 of Energy, were all in the pocket of Kleiner Perkins, where Al Gore works. Chu has now been  
20 replaced by an actress named Jennifer, who laughs at any suggestion that her job involves  
21 protecting America by keeping gas prices low and who owns the very companies that she is giving  
22 government funds to.

23 **Advising both Chinese state companies and the Pentagon, McKinsey &**  
24 **Co. exposed as 'private biased CIA-type operation'.**

25 McKinsey in recent years has faced accusations of alleged conflicts of interest in its  
26 bankruptcy work and other fields.

27 McKinsey put Steven Chu and his staff in the Department of Energy and Staffed the Obama  
28 White House. McKinsey flooded Congress, and the world, with biased "white papers" designed to



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1 convince everyone that the only solution to climate change were the companies owned by investors  
2 Kleiner Perkins and Greylock Capital, Mckinsey' Silicon Valley buddies. McKinsey was one of the  
3 biggest perpetrators of the "cleantech crash" because of the vast insider trading schemes they  
4 operated with Goldman Sachs.

5 McKinsey's work with the government gives it insights into U.S. military planning and  
6 weapons. But the firm has advised Chinese firms now on U.S. blacklists. Erik Carter for NBC News

7 By Dan De Luce and Yasmine Salam

8 WASHINGTON — Global consulting giant McKinsey & Co.'s work with both the  
9 Pentagon and powerful Chinese state-owned enterprises poses a potential risk to national security  
10 that federal agencies can no longer ignore, lawmakers and critics say.

11 McKinsey's consulting contracts with the federal government give it an insider's view of  
12 U.S. military planning, intelligence and high-tech weapons programs. But the firm also advises  
13 Chinese state-run enterprises that have supported Beijing's naval buildup in the Pacific and played a  
14 key role in China's efforts to extend its influence around the world, according to an NBC News  
15 investigation.

16 There is no evidence or allegation that McKinsey has damaged U.S. national security, and  
17 U.S. authorities have not charged the firm with violating federal contracting laws related to its work  
18 with Chinese clients.

19 But with [tensions high](#) between China and the U.S., McKinsey's business operations in both  
20 countries are coming under growing scrutiny. Critics say the firm, the world's largest consulting  
21 company, needs to divulge more details about its work in China, particularly amid concerns in  
22 Washington about Beijing's industrial espionage, [arms buildup](#) and [intellectual property theft](#).

23 Apart from its consulting in China, McKinsey has come under sharp criticism from  
24 lawmakers and faced legal challenges over alleged conflicts of interest in other fields.

25 The company this year agreed to pay \$573 million to settle allegations from 49 states that its  
26 work for opioid manufacturers helped "turbocharge" sales of the drugs, contributing to a deadly  
27 addiction epidemic. At the same time the firm [was working](#) for the pharmaceutical companies,  
28 McKinsey was advising the Food and Drug Administration on its prescription drug policy,

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1 according to court documents.

2        Asked about its work in China and the United States, McKinsey told NBC News that it  
3 abides by U.S. laws on federal contracting and that it has extensive internal rules to prevent  
4 conflicts of interest and to protect clients' information.

5        "We follow strict protocols, including staffing restrictions and internal firewalls, to avoid  
6 conflicts of interest and to protect client confidential information in all of our work. When serving  
7 the public sector, we go further: in addition to managing potential staffing conflicts, we are subject  
8 to our Government clients' organizational conflict of interest requirements and comply with these  
9 obligations accordingly," a company spokesperson, Neil Grace, said in an email.

10       The Pentagon and other federal government agencies rely on McKinsey to carry out often  
11 sensitive work touching on national security strategy, cybersecurity and cutting-edge technology,  
12 paying the firm hundreds of millions of dollars for its advice and data-crunching.

13       Since 2008, McKinsey has undertaken over [\\$851 million worth](#) of consultant work for the  
14 federal government, with the Defense Department as the top client, generating nearly a third of the  
15 firm's government revenue.

16       McKinsey has advised senior officials about weapons budgets, the Defense Department's IT  
17 network, modernizing naval shipyards, [developing technology](#) for the Space Force and Air Force  
18 and [evaluating the management of the F-35 fighter jet program](#).

19       "I can't see how you could work in the areas they're working in for the Defense Department  
20 and at the same time have the extensive connections in China, and not be compromised," said  
21 Marianne Jennings, a professor of legal and ethical studies in business at Arizona State University.  
22 "If you just step back objectively, there's a great deal of risk here for the United States."

23       In four federal contracts obtained by NBC News, including with the Defense Department  
24 and the Navy, McKinsey made no mention of its clients in China or any possible conflict of interest.  
25 Under federal law, contractors must disclose any possible conflicts of interest.

26       But McKinsey does not view its consulting for Chinese enterprises as a conflict, and experts  
27 say the federal government often doesn't focus on a contractor's foreign clients. Instead, federal  
28 officials usually look at whether a company has foreign ownership or control, and vet contractors'

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1 employees for any security concerns. Still, the burden is on the contractor to divulge even the  
2 appearance of a potential conflict.

3         Lawmakers from both parties and critics of McKinsey worry its work with Chinese state-  
4 owned companies could allow Beijing access to valuable information associated with the firm's  
5 extensive consulting with U.S. government agencies, possibly giving China an upper hand in its  
6 competition with the U.S. Even if no secret material was obtained by China, McKinsey could  
7 inadvertently provide Beijing with valuable insights into senior leadership and strategic thinking in  
8 the U.S. government, critics say.

9         In the past 13 years, McKinsey has worked on more than 60 contracts for different branches  
10 of the armed services and agencies within the Defense Department and there has been an uptick in  
11 the federal agency's use of its services in the last five years, according to the federal government  
12 website [USA spending.gov](https://www.usaspending.gov).

13         Some of McKinsey's work in Washington grants employees access to secret information,  
14 requiring a security clearance. A 2015 contract between the Pentagon's Defense Information  
15 Systems Agency and McKinsey obtained by NBC News gave McKinsey's team access to classified  
16 information.

17         The CIA hired McKinsey to help with a major reorganization of the agency during the  
18 Obama administration. After the 9/11 attacks, McKinsey [advised](#) the FBI on building its  
19 intelligence-gathering capability.

20         Information about the potential scope of McKinsey's work with the intelligence community  
21 is not publicly available, as details about the intelligence budget remain classified. But a former  
22 senior U.S. intelligence official told NBC News that McKinsey continues to do consulting work for  
23 the intelligence agencies.

24         The Pentagon's Defense Counterintelligence and Security Agency (DCSA) vets contractors  
25 before they are given access to classified information. The agency "takes seriously our  
26 responsibility to ensure only trusted personnel — both federal and contract — have access to  
27 classified information," said spokesperson Christopher Bentley.

28         For contractors, the agency ensures that companies "are not adversely influenced or

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1 controlled by foreign interests,” Bentley said.

2 But the agency declined to comment about McKinsey’s work for the federal government.  
3 McKinsey was [awarded](#) a contract this year worth \$1.2 million to advise the DCSA.  
4 [‘Red flag’](#)

5 In China, vast state-owned or controlled enterprises have [sought out](#) McKinsey for  
6 “strategic” advice. Some of McKinsey’s clients were blacklisted in 2019 and 2020 by the U.S.  
7 government as actively undermining U.S. national security interests. (All blacklisting occurred after  
8 McKinsey’s contracts were already in effect.)

9 U.S. authorities [say](#) one of the blacklisted firms, the China Communications Construction  
10 Company (CCCC), and its subsidiaries built a network of artificial islands in the South China Sea, a  
11 project that the U.S. and its allies see as an attempt to intimidate and coerce neighboring countries  
12 that have competing claims in the waterway. CCCC’s dredging fleet constructed more than 3,000  
13 acres worth of islands that have been turned into a string of military bases, with naval ports,  
14 runways, hangars, missile sites and radar, experts say. The Defense Department last year placed the  
15 firm on a list of companies deemed to have ties to the Chinese military.

16 The Commerce Department also placed CCCC on a separate blacklist and warned that  
17 transactions with Chinese firms on the list carry a “red flag,” recommending U.S. companies  
18 “proceed with caution with respect to such transactions.”

19 China Communications Construction Company put out a [press release](#) in 2015 promoting  
20 McKinsey’s role at a conference outlining the firm’s latest five-year plan.

21 McKinsey “made recommendations regarding the company’s overall strategic objectives,  
22 business portfolio strategy, organizational control strategy, strategy implementation path, core  
23 competency development, and other aspects,” it said.

24 McKinsey has acknowledged commercial links to China Ocean Shipping Company  
25 (COSCO), a state-owned conglomerate that has played a key role in China’s naval expansion and  
26 Beijing’s bid to extend its global reach. COSCO has not been blacklisted by the U.S. government.

27 A Cosco Shipping Lines Co. container ship in the Yangshan Deepwater Port in Shanghai,  
28 China, in 2019. Qilai Shen / Bloomberg via Getty Images file

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1 In a 2020 [federal court filing](#) related to McKinsey's advisory role in a bankruptcy case, the  
2 firm cited its connection to COSCO. That same year, the shipping company said in a [press release](#)  
3 that it had received advice from McKinsey.

4 As part of China's "Belt and Road Initiative," COSCO has been pouring Chinese  
5 government money into ports around the world and other logistics hubs. COSCO in recent years has  
6 [bought](#) a majority stake in the Greek port of Piraeus, invested in a new container [terminal](#) in the  
7 United Arab Emirates, and purchased a major stake in the Peruvian [port](#) of Chancay.

8 COSCO is among a core of state-owned enterprises that are part of the country's defense  
9 industrial base and are given special status by the ruling Chinese Communist Party, according to  
10 regional [analysts](#). The company has provided logistical [support](#) to the Chinese navy's escort  
11 operations in the Gulf of Aden and experts say it serves as the maritime logistical arm for the  
12 People's Liberation Army (PLA).

13 Meanwhile, McKinsey advised the U.S. Navy on plans to modernize its network of naval  
14 shipyards.

15 McKinsey, which set up business in China in the 1990s, [says](#) on its website it employs more  
16 than 1,000 people at six offices across the country and has carried out more than 1,500  
17 "engagements" with Chinese clients in the past five years.

18 According to McKinsey, the firm's work in China is carried out through a separate legal  
19 entity and most of its consulting does not involve state-owned enterprises (SOEs).

20 "The vast majority of that work is for the private sector, including with U.S. and other  
21 multinational companies. Our limited work with SOEs focuses on the same core commercial and  
22 operational topics on which we serve other major corporations," Grace, the company spokesperson,  
23 said.

24 The company declined to discuss its work with specific Chinese clients, including those that  
25 appear on U.S. government blacklists.

26 Grace said McKinsey follows an extensive internal policy to evaluate potential clients and  
27 does not serve political parties anywhere in the world or defense, intelligence, justice or policing  
28 institutions in countries with low rankings on the Economist Intelligence Unit's Democracy Index.

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1 But experts say major state-owned companies in China are virtual arms of the ruling  
2 Communist Party and have senior party officials embedded in the enterprise's leadership.

3 Asked about its relationship with Chinese enterprises with ties to the country's military,  
4 Grace said, "Consistent with our client service policy, we do not serve any clients in China on  
5 topics connected to defense, intelligence, justice or police issues."

6 According to the company's policy manual, McKinsey employees "are required to disclose  
7 any potential conflicts of interest, whether real or perceived, and to consult with relevant firm  
8 leaders and governance bodies on how best to handle the situation."

9 McKinsey also maintains strict standards on protecting data and ensuring "information  
10 security," Grace said.

11 "All client information, whether from the U.S. government or any other client, is subject to  
12 broad safety and security procedures that we regularly assess and test to ensure that the firm is  
13 deploying rigorous security measures," he said. "We follow all U.S. government requirements for  
14 handling its sensitive data — including where appropriate doing work on separate IT devices or  
15 only on client systems — and employ the requisite hardware and other security protocols to meet  
16 our obligations."

17 [The McKinsey Way](#)  
18

19 Founded in 1926, McKinsey has built up a vast consulting business with 36,000 employees  
20 and dozens of offices around the globe, advising governments and top corporations. Known for its  
21 connections in the upper echelons of corporate power and for shaping how American companies  
22 operate, McKinsey has a loyal alumni network, including numerous CEOs and top government  
23 officials.

24 According to Duff McDonald, author of a 2013 book on McKinsey, ["The Firm: The Story of](#)  
25 [McKinsey and Its Secret Influence on American Business."](#) the company's business model hinges  
26 on what it calls confidentiality. McKinsey often does not reveal who its clients are or the nature of  
27 its work.

28 The firm is able to operate behind a wall of "confidentiality" partly because the management

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1 consulting industry is virtually unregulated, both in the U.S. and around the world, according to  
2 experts.

3 The tight-lipped firm says the principle of confidentiality allows it to protect the interests of  
4 its clients. But critics say McKinsey's insistence on secrecy allows it to operate without  
5 accountability, and to provide advice to clients whose interests might be diametrically opposed.

6 "I don't think they have much compunction about working for anyone at all," McDonald  
7 said.

8  
9 **'No reason' to hire McKinsey**

10  
11 Under federal contracting law, companies are required to disclose any conflict of interest, or  
12 appearance of a conflict, when bidding on a proposal, and to present a plan to address the conflict. It  
13 remains unclear if McKinsey has disclosed any potential conflicts of interest due to its work with  
14 Chinese firms, including in its contracts for the Defense Department.

15 In the four federal contracts obtained by NBC News between McKinsey and the Defense  
16 Department, the Navy and Customs and Border Protection, the consulting firm did not cite its  
17 clients in China or any apparent conflicts of interest.

18 For a 2018 contract for the Naval Information War Center Atlantic, which provides satellite  
19 communications and other information technology support for naval forces, McKinsey "did not  
20 make a disclosure of possible appearances of conflict of interest," a Navy spokesperson said.

21 The U.S. Navy "was unaware of McKinsey's work with any Chinese state-owned  
22 enterprises," the spokesperson added.

23 For the 2015 contract between McKinsey and the Pentagon's Defense Information Systems  
24 Agency (DISA), which runs the military's computer network, the agency "was not aware of any  
25 conflict of interest or a possible appearance of a conflict of interest" concerning the contract, said  
26 Mary Constantino, spokesperson for DISA.

27 Asked about hiring McKinsey in the future, Constantino said the agency "cannot speculate  
28 on prospective work and has no pending awards."



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1 A spokesperson for the Defense Department, Jessica Maxwell, said that “each contract is  
2 examined individually” and the department “won’t speculate on future contracts or bids for  
3 contracts. “

4 Sen. Marco Rubio, R.-Fla., has demanded that the firm offer more information about its  
5 work in China and explain how it prevents possible conflicts between its consulting business for the  
6 U.S. government and for Chinese clients.

7 In a [November 2020 letter](#) to McKinsey, Rubio complained that the firm had failed to  
8 directly respond to many of his questions in earlier correspondence. The senator wrote he was  
9 concerned the firm “either wittingly or unwittingly — is aiding the Chinese Communist Party’s  
10 attempt to supplant the United States.”

11 The senator asked McKinsey if it sought to avoid working with Chinese clients in areas of  
12 critical national security interest to the U.S., including telecommunications, the military and health  
13 care.

14 The firm did not directly answer the question but said it could not disclose information on  
15 specific clients or engagements because of its “contractual and professional obligations to maintain  
16 confidentiality,” according to Rubio’s letter.

17 Rubio also asked McKinsey what kind of safeguards the firm had in place to ensure its work  
18 for U.S. government entities did not inform its work with Chinese companies. The firm provided no  
19 answer, Rubio wrote.

20 In addition to the exchange of letters, Rubio’s senior staff and top policy advisers met with  
21 members of McKinsey’s global leadership team via Zoom in March, according to a congressional  
22 aide present.

23 “Most of the meeting consisted of generalities, platitudes and broad denials of wrongdoing  
24 or conflicts of interest. Every time a member of Sen. Rubio’s staff asked specific questions,  
25 McKinsey’s leadership repeated that they could not discuss their clients,” the congressional aide  
26 said.

27 Rubio told NBC News the federal government should stop hiring McKinsey for consulting  
28 work.

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1 “There is no reason the U.S. Government should continue using McKinsey given the  
2 company’s inability to provide clear, direct answers about its work in China,” Rubio said in an  
3 email.

4 The McKinsey spokesperson confirmed the company’s senior leadership in the U.S. and  
5 Asia met via Zoom with Rubio’s staff this year.

6 “We have discussed our approach to client selection with the senator's office at length,  
7 including the diligence efforts we undertake to ensure that each client engagement complies with all  
8 necessary guidelines, regardless of where that service takes place,” Grace said.

9 “We also discussed with the senator's office our extensive internal safeguards to mitigate  
10 potential conflicts of interest and wall off sensitive information. We remain available to continue  
11 those discussions,” he added.

12 Rubio has [proposed legislation](#) that would require federal contractors to reveal any  
13 commercial ties with the Chinese government, military or state-controlled entities. Other lawmakers  
14 have proposed bills to prevent U.S. contractors from buying key technological equipment or solar  
15 panels from Chinese firms.

16 Rep. Mike Rogers of Alabama, the ranking Republican on the House Armed Services  
17 Committee, said it was important to know whether taxpayers' dollars are “fueling China’s military  
18 modernization.”

19 “If a federal contractor has ties to the [Chinese Communist Party] and its civ-mil fusion  
20 apparatus, the government should have tools to punish that behavior and rethink whether that  
21 company has the privilege of doing business with the U.S. government,” Rogers said.

22 The Chinese government and military’s increasingly tight control over the private sector is  
23 forcing the U.S. to “rethink our trade and commercial relationship,” including how federal contracts  
24 are vetted, said Michael McCaul of Texas, the ranking Republican on the House Foreign Affairs  
25 Committee.

26 McCaul said McKinsey’s work deserved “greater scrutiny” and the federal government  
27 needed to demand more transparency.

28 “Transparency is a core tenet of our democratic system. If the U.S. government is spending

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1 taxpayer dollars, it makes sense to understand how federal contractors are doing business with an  
2 adversary's military," McCaul said.

3 McKinsey is not the only consulting company doing business with the federal government  
4 and Chinese state-owned companies, and the emerging cold war between Beijing and Washington  
5 has created a dilemma for these firms, experts say.

6 U.S. defense contractors that work with the Pentagon are subject to strict laws and rules  
7 about what weapons and technology they can provide to foreign governments. But management  
8 consulting firms fall into a gray area, as they are selling advice, according to a former senior  
9 Pentagon official.

10 "If U.S. consultants gain knowledge about how the U.S. government works and transfer that  
11 knowledge to the Chinese government, that would be a red flag," said the former official.

12 Ensuring nothing spills over to a foreign client poses a difficult challenge, the official said.  
13 "Call me a skeptic, there might be ways to firewall it, but I just don't know if those are sufficient to  
14 protect national security."

15 China also worries U.S. firms could hand over sensitive information to its adversaries in  
16 Washington, and has imposed increasingly tough restrictions on American companies operating in  
17 the country, experts say. U.S. companies operating in China are under pressure to store data locally,  
18 making them increasingly vulnerable to Beijing scooping up proprietary data.

19  
20 **McKinsey's track record**

21  
22 In other work carried by McKinsey, the firm has faced accusations of conflicts of interest,  
23 and in some cases has apologized or agreed to costly settlements out of court.

24 Earlier this year, McKinsey agreed to pay nearly \$600 million to settle investigations into its  
25 role in helping boost [opioid sales](#). Lawsuits turned up documents showing how McKinsey pushed to  
26 ramp up sales of Purdue Pharma's OxyContin painkiller as a deadly opioid crisis gripped the  
27 country. The firm also sought to help Purdue fend off potential regulations by the FDA, even as it  
28 did consulting work for the FDA, according to court documents.

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1 The House Committee on Oversight and Reform announced this month that it was launching  
2 an [investigation](#) into McKinsey's consulting work for the opioid manufacturers, seeking documents  
3 regarding "the company's conflict of interest, and its apparent failure to monitor and prevent  
4 harmful practices."

5 McKinsey has come under federal investigation and been sued over allegedly flouting  
6 bankruptcy laws that require advisers to be [disinterested](#) advocates for clients and to disclose all  
7 relationships that might give rise to a [conflict](#) of interest.

8 In 2019, [McKinsey paid \\$15 million](#) to settle an inquiry by a unit of the Justice Department  
9 into whether it violated disclosure rules designed to prevent conflicts of interest in corporate  
10 bankruptcies. The firm, however, did not admit to any wrongdoing.

11 Last year, McKinsey agreed to forfeit millions of dollars in fees for advising [Westmoreland](#)  
12 [Coal Co.](#) in its bankruptcy, as part of a deal with federal officials probing Westmoreland's  
13 compliance with bankruptcy laws.

14 In South Africa, the consulting giant became embroiled in a corruption scandal after  
15 authorities began a fraud investigation into a \$120 million contract McKinsey had worked on with a  
16 public utility company, Eskom. The company had ties to the billionaire Gupta family, close friends  
17 of former President Jacob Zuma who were found to have pocketed public funds by South Africa's  
18 anti-corruption watchdog in 2016.

19 Eskom workers cut illegal connections during a energy management and losses campaign in  
20 Gauteng, South Africa, on Sept. 29, 2020. Alet Pretoriu / Gallo Images via Getty Images file

21 McKinsey issued an [apology](#) in 2017 over the Gupta case, saying it was "embarrassed" by  
22 the individuals whose work "fell short of our standards."

23 "There appears to be a pattern of behavior from McKinsey," said Sen. Maggie Hassan, D-  
24 N.H. "Whether it be the health of Americans or the national security of our country, McKinsey has  
25 repeatedly taken actions that create serious concerns about conflicts of interest."

26 McDonald, author of "The Firm," said the company's bankruptcy work, its role in the opioid  
27 crisis and other examples show it has failed to regulate itself.

28 "They say the nature of the business is such that we maintain strict confidentiality. OK, well

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1 then in that case, you're the only ones that can regulate this," McDonald said. "And all the recent  
2 evidence in the last few decades suggests that they are either incapable, inept or not inclined to do  
3 so."

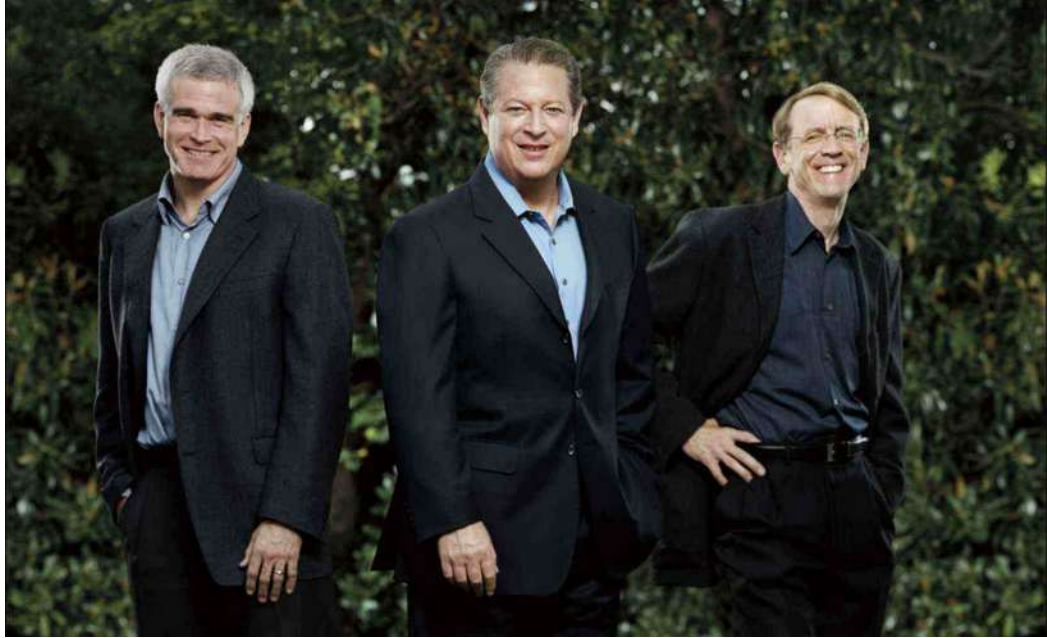
4 Now I would like to tell you about one very interesting character in the US establishment  
5 named Al Gore. This is the former US Vice President under Clinton, the presidential candidate in  
6 2000 and the Nobel Peace Prize winner for the film An Inconvenient Truth (2006) about global  
7 warming.

8 His film and book have actually become the foundation for modern climate policy and the  
9 public demand for renewable energy sources. One should notice keep in mind that along with the  
10 awareness of internal concern for the ecology Al Gore was one of the first who realized the  
11 commercial potential in projects devoted to the protection of the environment.

12 Two years before 'An Inconvenient Truth' Al Gore together with Goldman Sachs Chief  
13 Asset Manager David Blood has run a new investment company Generation Investment  
14 Management. As a result, they both defined terms sustainable investing and ESG.

15 The former presidential candidate, as we could see, was very good at technology and  
16 finance. In 2007, he was suddenly [invited](#) to become a partner in Kleiner Perkins — one of the  
17 oldest and largest venture funds of Silicone Valley. John Doerr, one of Kleiner Perkins chief  
18 partners, joined the advisory board of Generation Investment Management.

19 J. Doerr, as Al Gore, stood for the innovations in clean energy to struggle with climate  
20 change. On the TED conference in 2007, he quoted his daughter "your generation created this  
21 problem, you better fix it". That reminds me on Greta Thunberg's words which would be told later.  
22 So that J. Doerr and Al Gore had a similar vision of the future and the month after mentioned  
23 partners' rotation Kleiner Perkins fund invested into Silver Spring Networks. Biden's daughter,  
24 Ashley, left her hand-written diary for journalists to find where she reveals the same thoughts (in  
25 addition to her naked shower play with Joe Biden)

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By great coincidence, this deal happened a year before the US Department of Energy [had announced](#) a \$3.4 billion grant program for smart grid developers. In fact, \$560 million of this amount was spent to utilities serviced by Silver Spring Networks, which works exactly with smart grids. 6 years later Silver Spring Networks successfully entered an IPO.

Luck literally pursued Kleiner Perkins. In 2008, the fund invested tens of millions dollars in a start-up hybrid cars manufacturer Fisker Automotive. After that, in September 2009, the company [received](#) a low-interest \$529 million loan under the Advanced Technology Vehicle Manufacturing (ATVM) direct loan program from the same US Department of Energy.

Congress [passed](#) ATVM in 2007 after a drop in sales in the big three (General Motors, Ford, and Chrysler). The volume of the borrowed capital was \$25 billion. The goal of the program was to help the US auto industry to reduce fuel costs because Americans were tend to choose more fuel-efficient Japanese cars. That is, the problem devoted not to ecology issues, but much more to fuel saving.

Again, ATVM passed in 2007, but the allocation of funds began only 2 years later on a competitive basis. In February 2009, 8 months before the government loan to Fisker Automotive, John Doerr of Kleiner Perkins [became](#) a member of the Presidential Economic Recovery Advisory Council. The funny thing is that Fisker did not even have manufacturing facilities in the USA and

the assembly of their Karma models took place in Finland.

The Obama-Biden administration appointed a venture capitalist from Kleiner Perkins as a member of an economic advisory board. They also signed a government loan for help American automotive industry to a company (without any manufacturing capacity in the United States) that Kleiner Perkins has invested in.

That trick [was obviously noticed](#) by the public. Some companies [have sued](#) the Department of Energy, Mitt Romney even [called on](#) Congress to open an investigation into the loan to Fisker Automotive, pointing out that its investors included Al Gore, who sponsored Obama's presidential campaign. Nevertheless, somehow all those worries dwindled away as federal cover-ups went into full swing.

Fisker's plans to start the manufacture at a closed GM plant in Delaware at the expense of a government loan, which GM itself did not receive, deserved special attention. These plans caused some questions among local residents, and then current Vice President Joe Biden, who served as Senator from Delaware from 1973 to 2009, [assured](#) people that the budget money for Fisker would be paid off, and the company will eventually return "billions-billions" dollars to everyone.

Running ahead, the budget money didn't return to taxpayers because Fisker went bankrupt in 2013. From the bankruptcy documents, which fell into the journalists' hands only 7 years later, it [turned out](#) that Hunter Biden (Joe Biden's son) was an investor of Fisker. However, this fact also faded into oblivion without preventing Biden from gaining 58.8% of the votes in Delaware during the 2020 presidential election.



Let us turn back to Tesla. Only \$8.4 billion [were allocated](#) from the \$25 billion program of help to the American auto industry. Only 5 companies received money, although 108 applications were received. Almost \$6 billion went to Ford with a democratically oriented management, \$1.5 billion were given to Nissan, about half billion — to Fisker and Tesla and, finally, \$50 million came



1 to a less known VPG company.

2  
3  
4 Surprisingly, the credit limit has not been exhausted, large manufacturers like General  
5 Motors or Chrysler did not receive money, but two unprofitable startups from California, selling  
6 several hundred cars each, [did](#). We already know the main lobbyists of Fisker — they are Al Gore  
7 and John Doerr, who invested in Fisker through Kleiner Perkins. But were they acquainted with  
8 Elon Musk? A brief search immediately gave a positive answer to that question.

9 In 2013, Al Gore, while talking about his new Tesla S in an interview to Yahoo Finance,  
10 [called](#) Elon Musk his friend. More than that, his son Al Gore III [has been in charge](#) of Policy &  
11 Business Development at Tesla since 2015. After learning that I immediately went to have a look at  
12 the Generation Investment Management profile on CB Insights. It turned out that the Gore fund had  
13 invested in Musk's SolarCity in 2011 and Gore III [worked there](#) as a Policy Officer.



15  
16  
17 Then in 2016, Tesla acquired SolarCity. An unprofitable service company that didn't even  
18 produce solar panels was taken over for a suspiciously large amount of money. Recently it [turned](#)  
19 [out](#) that Elon Musk has faced a \$9.4 billion fine for this deal, although the final court decision had  
20 not been made yet. It is important that after the takeover in 2018, Al Gore became suddenly  
21 [nominated](#) for the post of chairman of the Tesla board of directors.

22  
23  
24 Al Gore [rejected](#) that offer but I did not doubt more about his close connection with Tesla.  
25 At the same time, I was interested in their possible contacts before receiving the lobbied state  
26 subsidies of 2009. That's why I decided to change the angle and check whether Tesla has a  
27 relationship with Kleiner Perkins. Then it turned out that Elon Musk had been friends with John  
28 Doerr for a very long time.

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1 In 2006, when Tesla looked for money in round C, Kleiner Perkins fund offered \$50 million,  
2 while VantagePoint offered \$70 million. Despite the huge difference in bids, Musk wanted to strike  
3 a deal with Kleiner Perkins but on the condition that John Doerr would sit on the board of directors.  
4 Unfortunately, J. Doerr had many other obligations and was forced to refuse. That's why Musk  
5 chose VantagePoint, as he [told](#) in an interview.

6 I went on and learned that the vice president of Tesla in 2006–2017 was Diarmuid  
7 O'Connell. As I remember, he [was responsible](#) for national security issues under former Secretary  
8 of State Colin Powell. He also spoke about Iraq chemical weapons and showed test tube to  
9 legitimize the military invasion of Iraq at the UN in 2003.

10 I wondered how he appeared in that story. However, I didn't have to look for an answer for  
11 a long time, so let us meet Colin Powell, a member of the advisory board of Kleiner Perkins, a  
12 strategic partner of the fund in 2005.

13 There was no direct investment from the fund in the company, nevertheless it seems that  
14 there was another strong connection between Kleiner Perkins and Tesla. Is Al Gore really not a  
15 government subsidy beneficiary for Tesla? My confirmation bias did not allow this thought to get  
16 along in my head. Searching for keywords, I came across publications in [Yahoo Finance](#) and [Insider](#)  
17 [Monkey](#). The articles mentioned Gore's earlier investment in Tesla.

18 Keeping in mind that the journalists could simply make a mistake, I began to study which  
19 funds were invested in Tesla at earlier stages and whether Al Gore was involved. Finally, I came  
20 across [an interview](#) with the managing partner of Capricorn Investment Group on the blog of the  
21 Japanese financial holding Nomura. He said that Capricorn financed the filming of 'An  
22 Inconvenient Truth' movie.

23 Capricorn was founded by Jeffrey Skoll, the former eBay president and billionaire. The fund  
24 invested in Tesla together with SpaceX at early stages. Mr Gore [brought in](#) \$35 million! Can you  
25 imagine? "That's a big wad of cash for someone who reported barely \$2 million in assets in 2000,  
26 when his job as vice president came to an end", as the New York Times wrote in 2008.

27 As a result, Al Gore was the direct beneficiary of providing state loans under the ATVM  
28 program for Fisker Automotive and Tesla Motors, in which he owned shares through

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1 venture funds Kleiner Perkins and Capricorn Investment Group.

2 When I proved it, I wanted to learn more about Al Gore's bio. It has been revealed that after  
3 losing the election, in 2001, he [became](#) a vice president of Metropolitan West Financial — a  
4 company with more than \$65 billion in assets under management. The company [was managed](#) by  
5 former heads of Drexel Burnham Lambert. That was a bankrupt investment bank, which history was  
6 very similar to Lehman Brothers.

7 The same year Mr Gore also joined the Google Advisory Board, in which he [invested](#)  
8 together with Kleiner Perkins in 1999. Probably that was the time when he met John Doerr. Then, in  
9 2003, the former US presidential candidate became a member of Apple's board of directors. In  
10 addition, the founders of Google were also early investors in Tesla.

11 It is clear that Albert Gore had many connections in political and financial communities. In  
12 2006, he started a charitable organization The Alliance for Climate Protection. The company  
13 [launched](#) a \$300 million (sic!) ad campaign to mobilize Americans to reduce greenhouse gas  
14 emissions immediately. As a result, an “inconvenient truth” was told to everyone.

15 In 2009, Gore [appeared](#) before the United States Senate Committee on Foreign Relations to  
16 support Obama's economic recovery plan. Then the government had passed the Recovery and  
17 Reinvestment Act, which included an \$80 billion stimulus package to promote green energy  
18 initiatives. Newspapers [called](#) the bill the “biggest energy bill in history”.

19 The person who owns stakes in Tesla and Fisker first knocks out government loans and  
20 then pushes a law according to which manufacturers of electric vehicles should pay  
21 fewer taxes, and buyers of electric vehicles should receive tax deductions. Can you  
22 imagine?

23 Surely, Al Gore was not the only one who acted in this process. In 2006, Nick Pritzker, the  
24 brother of Hyatt founder, [invested](#) in Tesla. His niece Penny Pritzker became the 38th US Secretary  
25 of Commerce in Barack Obama's cabinet, and his nephew was the Governor of Illinois. In general,  
26 Pritzker is one of the richest families in the US.

27 Among of early investors in Tesla there is Steve Westley, a politician and businessman. He  
28 has already joined the company's board of directors in 2007. More than that, during the 2008

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1 presidential election, Westley [acted](#) as a co-chairman of California's Obama for America campaign.  
2 Currently, he is a member of the US Department of Energy advisory board.

3 Al Gore, John Doerr, Nick Pritzker, Steve Westley, Elon Musk, Sergey Brin, Larry Page —  
4 all of them [were](#) so-called donors and beneficiaries to the Obama campaign. I mentioned only the  
5 names from the public access. Let me remind that these people are only mentioned in the context of  
6 the Tesla story while the whole green initiative and the Recovery and Reinvestment Act affects a  
7 much larger number of companies and investors.

8 The rapid development of electric vehicle companies is taking place in a distorted market  
9 environment. Their commercial success is mainly driven by government incentives unavailable for  
10 ICV cars manufacturers.

11 The US government is literally restructuring the auto market by hand in order to make one  
12 guy: Elon Musk, massively rich.. In that case the active discussions about climate change and  
13 greenhouse gas emissions could probably be nothing more than a part of a program to reallocate  
14 money in the US establishment since Nancy Pelosi, George Soros and The Feinstein family are the  
15 true owners of the stock profits from Elon Musk.

16 However, the question remains whether this is really a good thing, because there is no full  
17 consensus in the scientific community regarding the general belief in the environmental friendliness  
18 of electric vehicles and the beneficiaries are always the same 50 people associated with Nancy  
19 Pelosi.

# HISTORY PROVES THAT EVERY COVER-UP HARMS THE GOVERNMENT OFFICIALS, THAT RUN THE COVER-UP, MORE THAN ANYONE ELSE

'I'm triggered, drained...': Aly Raisman details devastating toll of reliving Larry Nassar sexual abuse for senate's FBI probe - as she blasts DoJ's failure to attend: 'They didn't think it was worth their time, which is concerning'



Raisman, 27, Simone Biles, 24, McKayla Maroney, 25, and Maggie Nichols, 24, all gave damning testimony before the Senate Judiciary Committee on Wednesday.

28 comments 3 videos 29 shares

Simone Biles earns coveted spot on Time 100 list of most influential people alongside Olympic teammate Suni Lee - as she gives heartbreaking testimony about Larry Nassar's abuse at Senate hearing on Capitol Hill



Biles, 24, was featured on a cover of the 2021 Time 100 issue, for which she was profiled by tennis pro Serena Williams.

Tearful McKayla Maroney says the FBI 'made entirely false claims about what I said' during excoriating testimony about Larry Nassar sexual abuse at Senate probe into agency 'lies and cover-up'



Maroney and Biles blamed USA Gymnastics and the FBI for enabling Nassar's sexual abuse to dozens of women and girls, due to the agency's failure to promptly investigate allegations against Nassar.

85 comments 4 videos 315 shares

'They Wanted To Cover It Up': McKayla Maroney Blasts FBI ...

<https://www.shorenewsnetwork.com/2021/09/16/they-wanted-to-cover-it-up-mckayla-...>  
Maroney accused the FBI of failing to protect her like they were supposed to do and instead "they wanted to cover it up." "This was very clear, cookie-cutter pedophilia and abuse," Maroney testified.

Editor Daily Rundown: Olympic Gymnast Accuses FBI Of ...

<https://dailycaller.com/2021/09/16/editor-daily-rundown-olympic-gymnast-accuses-fbi-...>  
THE FBI FAILED TO PROTECT THE VULNERABLE.. 'They Wanted To Cover It Up': McKayla Maroney Blasts FBI For Concealing Her Detailed Accounts Of Larry Nassar Abuse - U.S. Olympic gymnast McKayla Maroney accused the FBI of concealing her detailed account of sexual abuse by Larry Nassar at a Senate hearing on the agency's investigation.

MASSIVE FBI Cover Up Exposed: Las Vegas Massacre Linked To ...

<https://conservativefiringline.com/massive-fbi-cover-exposed-las-vegas-massacre-lin...>  
The "official" narrative you've been fed by the FBI and Las Vegas officials about the massacre at Mandalay Bay that claimed 58 lives is purely fiction, a polished story contrived to cover up the disturbing facts surrounding the worst mass shooting ever in the United States, according to the FBI insiders and high-ranking intelligence officials.

Unsealed Epstein Docs EXPOSE FBI Cover-Up of Powerful ...

<https://headlineusa.com/epstein-docs-expose-fbi-cover-up/>  
Hillary Clinton, meanwhile, was embroiled in an equally notorious FBI cover-up of her own, "Operation Mid-Year Review," which was led by corrupt agent Peter Strzok. Appropriately, another convicted pedophile, Anthony Weiner, would prove to be her undoing after classified emails showed up on the former congressman's personal laptop while ...

Benghazi Scandal Coverup -- Clinton & Obama Administration ...

<https://www.nationalreview.com/2016/06/benghazi-scandal-hillary-clinton-state-depar...>  
The Benghazi terrorist attack occurred 56 days before the 2012 presidential election. In his campaign for reelection, President Obama repeatedly declared that the ...

## Pope taps Chilean sex abuse whistleblower for Vatican panel

By Associated Press - March 24th 2021, 12:38:59 pm

VATICAN CITY (AP) - Pope Francis on Wednesday named a Chilean survivor of clerical sex abuse to serve on a Vatican commission that advises the pontiff on how.

## Man accused of being involved in plot to kidnap Michigan Gov. Gretchen Whitmer claims FBI agent tried to 'cover up the fact the agency encouraged the conspiracy'

By Snejana Farberov For Dailymail.com - August 18th 2021, 5:22:22 pm

Brandon Caserta, one of the six men indicted for allegedly plotting to kidnap Gov Gretchen Whitmer, claims that an FBI agent told an informant to lie and delete texts as part of an entrapment coverup.

## DEEDS DONE IN THE DARK ALWAYS COME TO LIGHT

The FBI, and other law enforcement organizations, define a "cartel" as: 'An association of industrialists and business firms organized covertly to establish a national, or international



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monopoly, by price fixing and ownership of controlling stock, to operate a trust or monopoly to reduce competition between themselves by allocating markets, censoring public knowledge, manipulating governments or controlling the price and production of a product or service.'

This case is about a crime "cartel" which operating within government offices.

Every single California Senator, federal public official and White House staffer that we have charged with crimes in the complaint has now been exposed in main stream global media, in tens of thousands of print, web and video news reports as the owners of the stock, and the board members of, the companies that engaged in the crimes. 90% of the political officials charged with these crimes owned the stock of, and received other bribes from, the competitors of Plaintiffs:

**REVEALED: Two Fed presidents with insider knowledge of US monetary policy sold millions of dollars of stock in blue-chip firms including Amazon, Apple, and Google last year, prompting ethics review**



Dallas Fed President Robert Kaplan (left) and Boston Fed President Eric Rosengren (right) sold millions in stock last year - prompting Fed Chair Jerome Powell (inset) to call for ethics review.

**Members of The Fed, The White House, Congress and government agency bosses are paid bribes via trillions of dollars of covert stock market transactions!**

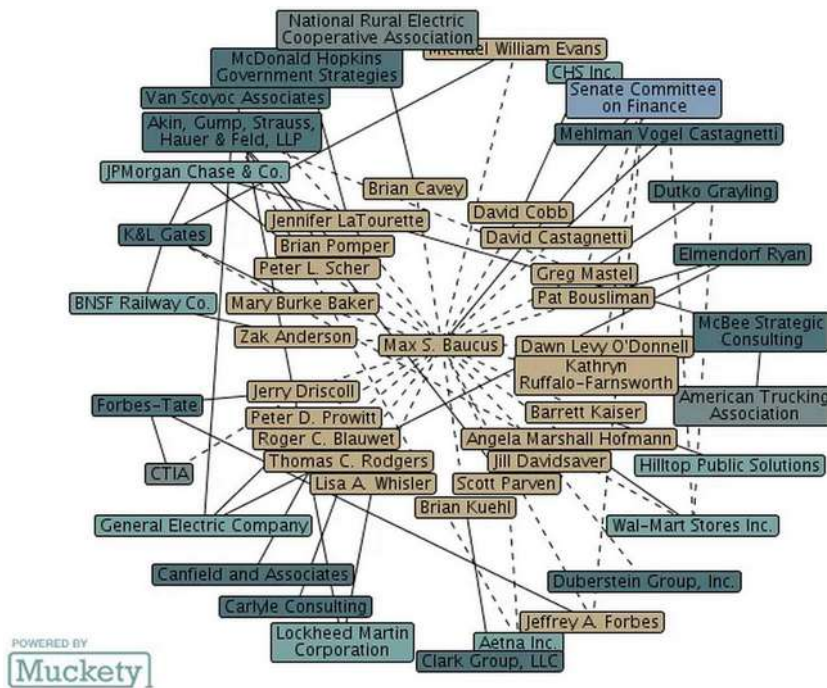
White House Staff including **Rahm Emanuel, Bill Daley, Jay Carney, David Plouffe, Robert Gibbs, Steve Rattner, David Axelrod, John Podesta**, et al; and **Steven Chu, Daniel Cohen** and **Bill Cooper** were, (from 2007 forward), either financed by, friends, with, sleeping with, dating the staff of, holding stock market assets in, promised a revolving door job or government service contracts from, partying with, personal friends with, photographed at private events with, exchanging emails with, business associates of or directed by; our business adversaries, or the Senators and politicians that those business adversaries pay campaign finances to, or supply

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political digital search manipulation services to. Criminal U.S. Senators coordinated and profited in these schemes. Their own family members have now supplied evidence against them. Elon Musk and his frat boys display their self-aggrandizing vanity in sociopath glory because nobody tells them "no". Now we are calling them out!

Dianne Feinstein has over \$100 million dollars on a \$170K salary. Where did all that other money come from? FBI, FINCEN, GAO Forensic audits and private investigators prove that stock market manipulations all trace back to political deals that she held and interest in. The same amounts apply to Nancy Pelosi, her bank account records and her family insider trading deals tied to political actions she managed.

Almost all of the staff for the many Senators in question started out working to serve the public and then left to work for corporations to help them rig politics to HARM the public:



This Cartel created and promoted a bogus mining scam for electric car and cell phone batteries which they knew to be unobtainable in any manner that would not harm American national security, worker human rights and safety, and the national economy. They knew that these particular materials did not exist anywhere in the world in a volume that would address national market needs without forcing products to become so expensive that few could afford them. They

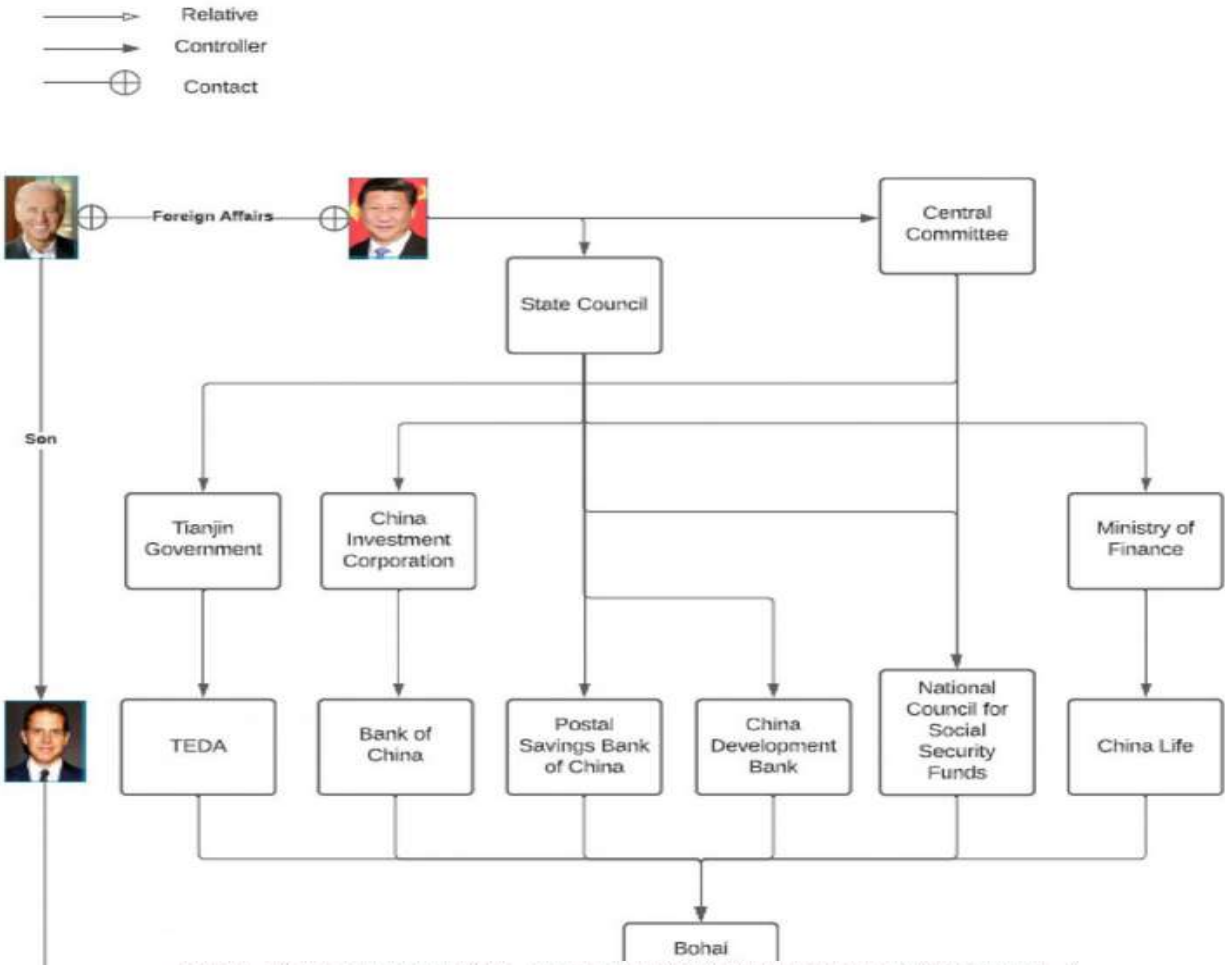


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1 knew that the product creation produced worker genocide, rapes, murders and poverty. They knew  
2 that the products from these efforts were explosive, cancer-causing, brain and liver damaging and  
3 toxic to the environment. This Cartel ignored these issues, on purpose, out of pure unmitigated  
4 greed!

5 Another way that bribes are passed is via a process called “layered inversion”. China has  
6 vast rare earth mines for electric cars so one would want to have an “in” there, such as:

**HOW HUNTER RECEIVED CHINESE STATE MONEY**



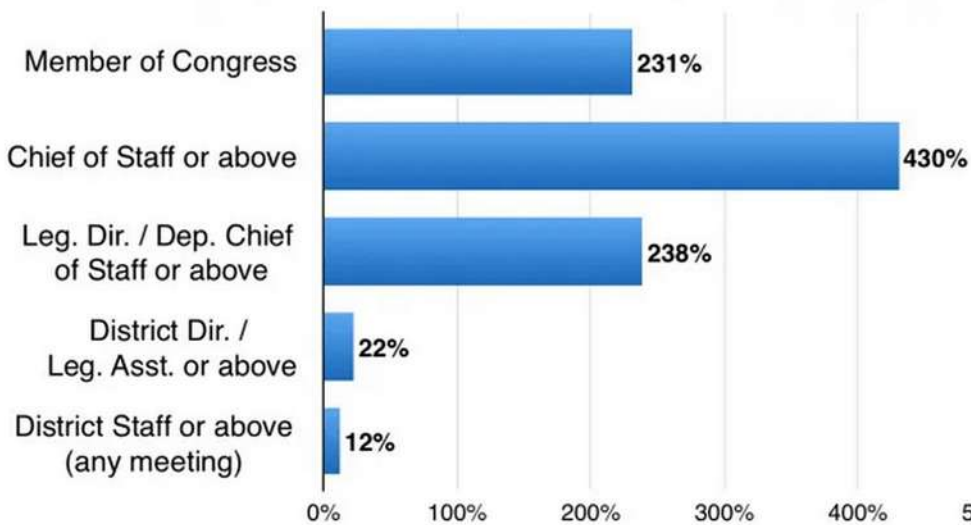
**POLITICAL CAMPAIGN FINANCIERS EACH RECEIVED WHITE HOUSE FAVORS EQUAL IN SIZE TO THEIR CASH IN**



**Figure 1. Percentage Increase in Access Revealed Donors Gained, At Or Above Each Level**

■ % Increase in Access Gained At Or Above Each Level

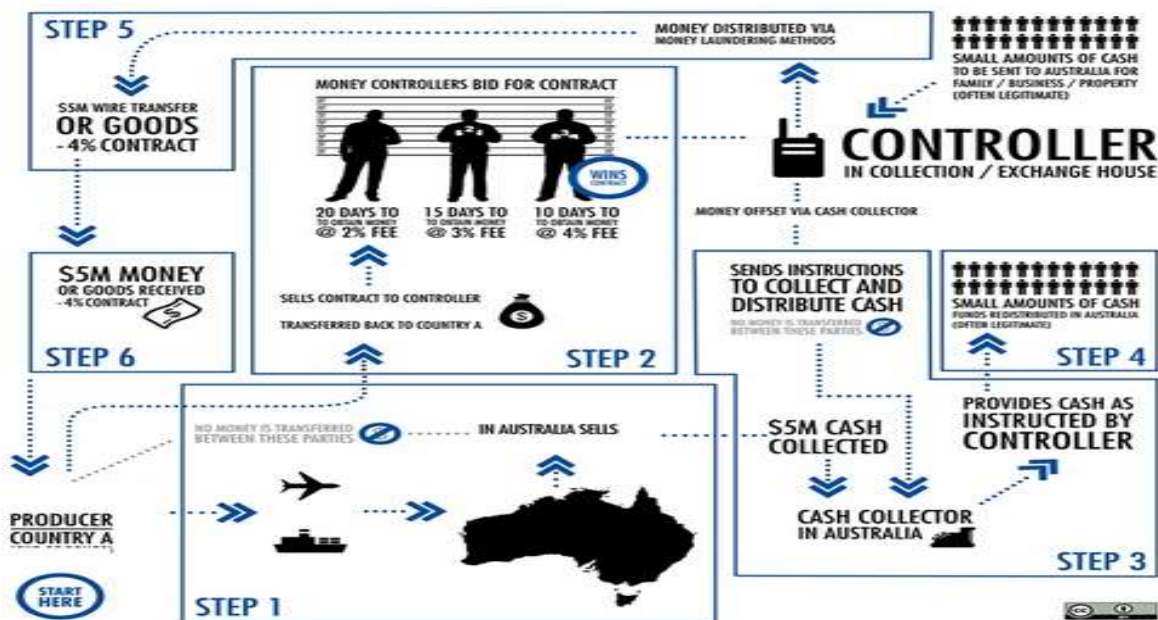
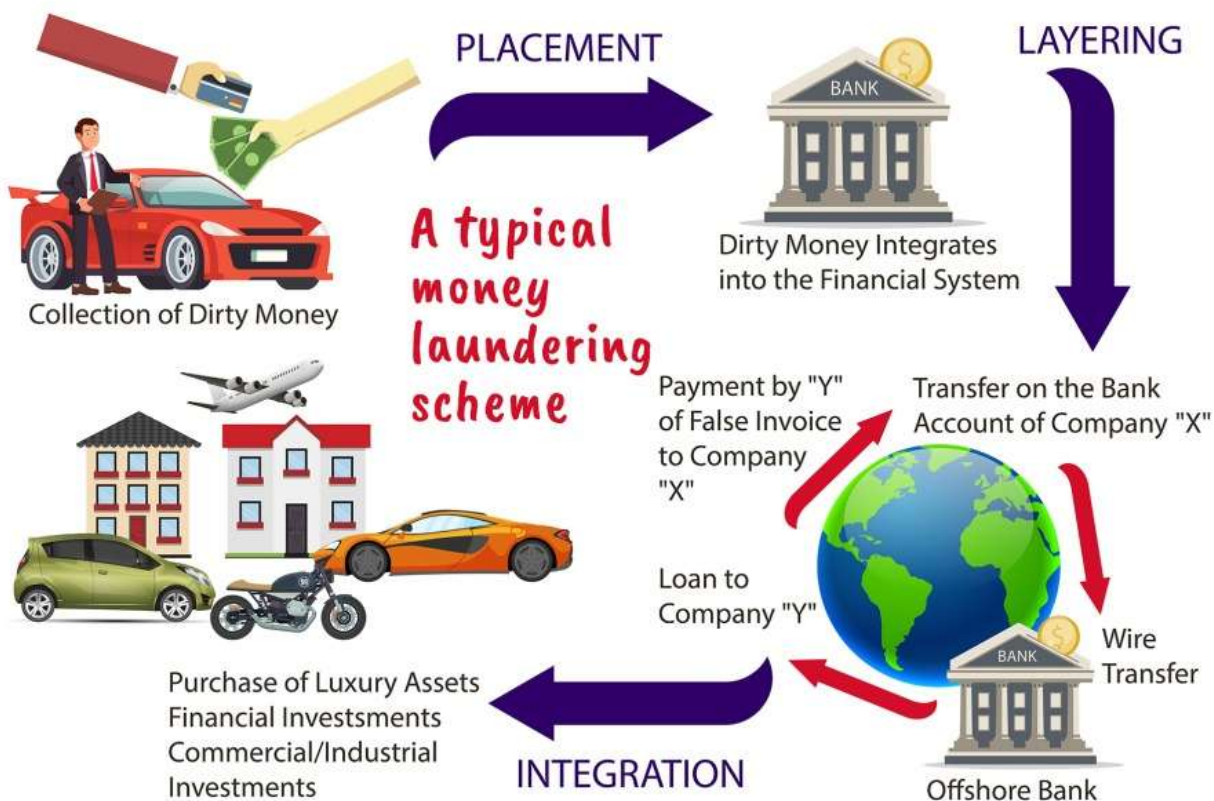
Figure 6 received equity st said his appears the presi



rs  
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All of the bribes by Defendants used a technique called "money laundering":



From 2007 forward, The White House and various agencies were controlled by the Silicon Valley tech oligarchs for monopolistic profiteering! That is a violation of the law, the Constitution

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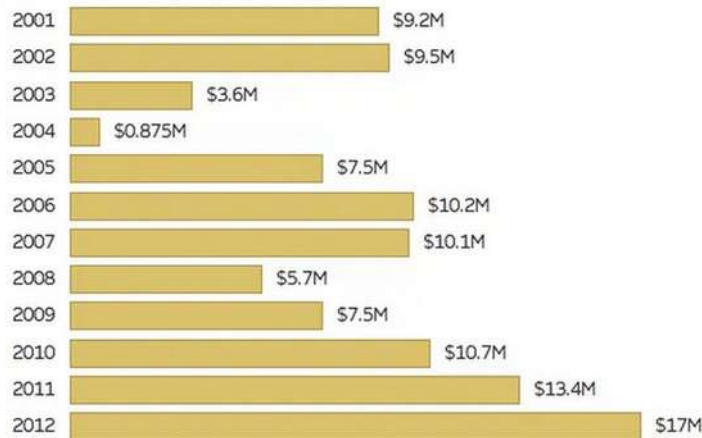
1 and the American Way. The named person's we have presented to the FBI, DOJ, SEC and other  
2 agencies, engaged in crimes to personally profit in the stock market and political venues. At the  
3 same time they operated the command and control of millions of dollars of defamation, character  
4 assassination and black-list attacks against us for reporting their crimes. These perpetrators are now  
5 being exposed, arrested, indicted and drained of their ill-gotten profits. We are owed our damages  
6 compensation and we will not rest until we get it! Every member of the public is invited to help  
7 crowd-source the termination of these corrupt crooks.

8       This Cartel of California & Washington, DC politicians is being paid **bribes** with: billions of  
9 dollars of Google, Twitter, Facebook, Tesla, Netflix and Sony Pictures stock and stock warrants  
10 which is never reported to the FEC; Billions of dollars of Google, Twitter, Facebook, Tesla, Netflix  
11 and Sony Pictures search engine rigging and shadow-banning which is never reported to the FEC;  
12 Free rent; Rare-Earth mining rights; Male and female prostitutes; Cars; Dinners; Party Financing;  
13 Sports Event Tickets; Political campaign printing and mailing services "Donations"; Secret PAC  
14 Financing; Jobs in Corporations in Silicon Valley For The Family Members of Those Who Take  
15 Bribes And Those Who Take Bribes; "Consulting" contracts from McKinsey as fronted pay-off  
16 gigs; Overpriced "Speaking Engagements" which are really just pay-offs conduit-ed for donors;  
17 Gallery art; Private jet rides and the use of Government fuel depots (ie: Google handed out NASA  
18 jet fuel to staff); Recreational drugs; Real Estate; Fake mortgages; The use of Cayman, Boca Des  
19 Tores, Swiss and related money-laundering accounts; The use of HSBC, Wells Fargo, Goldman  
20 Sachs and Deutsche Bank money laundering accounts and covert stock accounts; Free spam and  
21 bulk mailing services owned by Silicon Valley corporations; Use of high tech law firms such as  
22 Perkins Coie, Wilson Sonsini, MoFo, Covington & Burling, etc. to conduit bribes to officials; and  
23 other means now documented by us, The FBI, the FTC, The SEC, The FEC and journalists.

24       Bribes are conduit-ed as "speaker fees" and Netflix "Board Positions":  
25  
26  
27  
28

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## Bill Clinton's earnings from speaking fees



Source: CNN

V

*Figure 7: A common method of paying bribes is via inflated "speaker fees"*

We worked for, with, in and around the White House and various agencies. We were at the homes of the most famous people in government and their Silicon Valley financiers. We have cooperated with top law enforcement and Congressional investigators. Additional whistle-blowers have provided our effort with even more evidence. Ourselves, and investigating agencies, have absolute proof of the crimes, corruption and illicit activities and the ongoing cover-ups.

These crooks hide their bribes in covert "trust arrays". Any corporation can add more bribe cash to these trusts and an intermediary later informs the politician or oligarch that the "money is in".

It's well known, at least among tax lawyers and accountants for the ultra-wealthy: The estate tax can be easily avoided by exploiting a loophole unwittingly created by Congress three decades ago. By using special trusts, a rarefied group of Americans has taken advantage of this loophole, reducing government revenues and fueling inequality.

There is no way for the public to know who uses these special trusts aside from when they've been disclosed in lawsuits or securities filings. There's also been no way to quantify just

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1 how much in estate tax has been lost to them, though, in 2013, the lawyer who pioneered the use of  
2 the most common one — known as the grantor retained annuity trust, or GRAT — estimated they  
3 may have cost the U.S. Treasury about [\\$100 billion](#) over the prior 13 years.

4 As Congress considers cracking down on GRATs and other trusts to help fund President Joe  
5 Biden’s domestic agenda, a new analysis by ProPublica based on a trove of tax information about  
6 thousands of the wealthiest Americans sheds light on just how widespread the use of special trusts  
7 to dodge the estate tax has become.

8 More than half of the nation’s 100 richest individuals have used GRATs and other trusts to  
9 avoid estate tax, the analysis shows. Among them: former Democratic presidential candidate  
10 Michael Bloomberg; Leonard Lauder, the son of cosmetics magnate Estée Lauder; Stephen  
11 Schwarzman, a founder of the private equity firm Blackstone; Charles Koch and his late brother,  
12 David, the industrialists who have underwritten libertarian causes and funded lobbying efforts to  
13 roll back the estate tax; and Laurene Powell Jobs, the widow of Apple founder Steve Jobs. (Powell  
14 Jobs’ Emerson Collective is among ProPublica’s largest donors.)

15 More than a century ago amid soaring inequality and the rise of stratospherically wealthy  
16 families such as the Mellons and Rockefellers, Congress created the estate tax as a way to raise  
17 money and clip the fortunes of the rich at death. Lawmakers later added a gift tax as a means of  
18 stopping wealthy people from passing their fortunes on to their children and grandchildren before  
19 death. Nowadays, 99.9% of Americans never have to worry about these taxes. They only hit  
20 individuals passing more than \$11.7 million, or couples giving more than \$23.4 million, to their  
21 heirs. The federal government imposes a roughly 40% levy on amounts above those figures before  
22 that wealth is passed on to heirs.

23 For her part, Powell Jobs has decried as “dangerous for a society” the early 20th century  
24 fortunes of the Mellons, Rockefellers and others. “I’m not interested in legacy wealth buildings, and  
25 my children know that,” she [told The New York Times](#) last year. “Steve wasn’t interested in that. If  
26 I live long enough, it ends with me.”

27 Nonetheless, after the death of her husband in 2011, Powell Jobs used a series of GRATs to  
28 pass on around a half a billion dollars, estate-tax-free, to her children, friends and other family,



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1 according to the tax records and interviews with her longtime attorney. By using the GRATs, she  
2 avoided at least \$200 million in estate and gift taxes.

3 Her attorney, Larry Sonsini, said Powell Jobs did this so that her children would have cash  
4 to pay estate taxes when she dies and they inherit “nostalgic and hard assets,” such as real estate, art  
5 and a yacht. (At 260 feet, [Venus](#) is among the larger pleasure ships in the world.) Without the \$500  
6 million or so passed through the trusts, he said, Powell Jobs’ heirs would have to sell stock that she  
7 intends to give to charity to pay her estate tax bill.

8 Sonsini said Powell Jobs, whose fortune is pegged at \$21 billion by Forbes, has already  
9 given billions away to charity and paid \$2.5 billion in state and federal taxes between 2012 and  
10 2020. “When you look at an estate that may be worth multiple billions, and all the rest is going to  
11 charity, and you put it in perspective, what is the problem we’re worried about here?” Sonsini  
12 asked. “This is not about creating dynasty wealth for these kids.”

13 In a written statement, Powell Jobs said she supports “reforms that make the tax code more  
14 fair. Through my work at Emerson Collective and philanthropic commitments, I have dedicated my  
15 life and assets to the pursuit of a more just and equitable society.”

16 Others whose special trusts ProPublica identified, including Bloomberg and the Kochs,  
17 declined to comment on why they’d set up the trusts or their estate-tax implications. Representatives  
18 for Lauder didn’t respond to requests to accept questions on his behalf. Schwarzman’s spokesperson  
19 wrote that he is “one of the largest individual taxpayers in the country and fully complies with all  
20 tax rules.”

21 A typical GRAT entails putting assets, like stocks, in a trust that ultimately benefits a  
22 person’s heirs. The trust pays back an amount equal to what the trust’s creator put in plus a modest  
23 amount of interest. But any gains on the investments above that amount flow to the heirs free of gift  
24 or estate taxes. So if a person puts \$100 million worth of stock in a GRAT and the stock rises in  
25 value to \$130 million, their heirs would receive about \$30 million tax-free.

26 In 1990, Congress accidentally [created](#) GRATs when it closed another estate tax loophole  
27 that was popular at the time. The IRS challenged the maneuver but lost in court.

28 “I don’t blame the taxpayers who are doing it,” said Daniel Hemel, a professor at the



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1 University of Chicago Law School. “Congress has virtually invited them to do it. I blame Congress  
2 for creating the monster and then failing to stop the monster once it became clear how much of the  
3 tax base the GRAT monster would eat up.”

4 Users of the trusts extend well beyond the top of the Forbes rankings, ProPublica’s analysis  
5 of the confidential IRS files show. Erik Prince, founder of the military contractor Blackwater and  
6 himself heir to an auto parts fortune, used the shelter. Fashion designer Calvin Klein has used them,  
7 as have “Saturday Night Live” creator Lorne Michaels and media mogul Oprah Winfrey.

8 “We have paid all taxes due,” a spokesperson for Winfrey said. A representative of Klein  
9 did not accept questions from ProPublica or respond to messages. A spokesman for Michaels  
10 declined to comment.

11 Prince also did not answer questions. “Hey if you publish private information about me I’ll  
12 be sure to return the favor,” he wrote. “Go ahead and fuck off.”

13 The GRAT has become so ubiquitous in recent decades that high-end tax lawyers consider it  
14 a plain vanilla strategy. “This is an off-the-shelf solution,” said Michael Kosnitzky, co-leader of the  
15 private wealth practice at law firm Pillsbury Winthrop Shaw Pittman. “Almost every wealthy  
16 person should have one.”

17 ProPublica’s tally almost certainly undercounts the number of Forbes 100 members who use  
18 shelters to avoid estate taxes. ProPublica counted only those people whose tax records or public  
19 filings explicitly mention GRATs or other trusts commonly used to dodge gift and estate taxes. But  
20 a wealthy person can call their trusts whatever they want, leaving plenty of trusts outside of  
21 ProPublica’s count.

22 This month, the House and Senate are hammering out proposals to raise revenue to help pay  
23 for the Biden administration’s plans to expand the social safety net. The legislative [blueprint](#)  
24 released by House Ways and Means Committee Chairman [Richard Neal, D-Mass.](#), would defang  
25 GRATs and other trusts, which would still be legal but no longer be as useful for estate tax  
26 avoidance. If the provision makes it into law, “it would put a major dent in GRATs,” said Bob Lord,  
27 an Arizona attorney who specializes in trusts and estates.

28 Senate Budget Committee Chairman [Bernie Sanders, I-Vt.](#), has [proposed](#) going further in

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1 undercutting estate tax avoidance tools. But the prospect of any reform is uncertain, as Democrats  
2 on Capitol Hill struggle to find the votes to pass the package of spending and tax changes.

3 GRATs are commonly described by tax lawyers as a “heads I win, tails we tie” proposition.  
4 If the investment placed in the GRAT soars in value, that increase passes to an heir without being  
5 subject to future estate tax. If the investment doesn’t go up, the wealthy person can simply try again  
6 and again until they succeed, leading many users to have multiple GRATs going at a time.

7 For example, Herb Simon, founder of the country’s biggest shopping mall empire and owner  
8 of the Indiana Pacers, was one of the most prolific GRAT creators in records reviewed by  
9 ProPublica. Since 2000, he has hatched dozens of the trusts, often more than one a year. In an  
10 [interview](#) with The Indianapolis Star in 2017, the octogenarian Simon said, “It’s always a big tax  
11 problem” for the next generation when someone dies, “but we’ve worked that tax problem. We  
12 won’t have a problem with that.”

13 A spokesperson for Simon didn’t respond to questions for this article.

14 Mentions of these trusts have periodically surfaced in the press after being disclosed in  
15 securities filings, as was the case with [trusts held](#) by Facebook co-founders Mark Zuckerberg and  
16 Dustin Moskovitz and Chief Operating Officer Sheryl Sandberg. In 2013, Bloomberg News  
17 published [a groundbreaking series](#) on GRATs, mining securities filings and other records to reveal  
18 how the mega-rich, including casino magnate Sheldon Adelson and such families as [Walmart’s](#)  
19 [Waltons](#), had perfected the use of the device.

20 ProPublica’s data shows that Michael Bloomberg, the majority owner of the company that  
21 bears his name and No. 13 on Forbes’ list of the wealthiest Americans, is himself a heavy user of  
22 GRATs. Over the course of a dozen years, he repeatedly cycled pieces of his private company in  
23 and out of the trusts — often opening multiple GRATs in one year. During that time, hundreds of  
24 millions of dollars in income flowed through Bloomberg’s GRATs, giving him opportunities to  
25 shield parts of his fortune for his heirs.

26 ProPublica described the transactions (but not the name of the person engaging in them) to  
27 Lord, the trusts and estates attorney. The GRAT is “the perfect loophole to avoid estate and gift tax  
28 in this situation,” said Lord, who is also tax counsel for Americans for Tax Fairness and an advocate

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1 for estate tax reform.

2 When Bloomberg ran for president in 2020, he vowed to shore up the estate tax. “Owners of  
3 the biggest estates are expert at gaming the system to reduce what they owe,” a campaign fact sheet  
4 for his tax plan said. Bloomberg vowed to “lower the estate-tax threshold, so that more estates are  
5 taxed,” and to “shut down multiple estate-tax avoidance schemes.” His fact sheet offered few details  
6 as to how he would do that, and it didn’t mention GRATs.

7 The legislation Congress is now considering to curtail GRATs would leave open other  
8 options for estate tax avoidance, including a cousin to the GRAT known as a charitable lead annuity  
9 trust, or CLAT, which contributes to charity while passing gains from stocks and other assets on to  
10 heirs. And the legislation would grandfather in existing trusts, meaning that those who have already  
11 established trusts would be able to continue to use them to avoid paying estate taxes.

12 That has set off a predictable push by tax lawyers to get their clients to create tax-sheltering  
13 trusts before any new legislation takes effect.

14 Porter Wright, a law firm that offers estate planning services, [told existing and potential](#)  
15 [clients](#) it was “critical” to evaluate opportunities because “the window may close very soon. There  
16 are important and time sensitive issues which could substantially impact the amount of wealth you  
17 are able to transfer free of estate and gift tax to future generations.”

**EXHIBIT 6 – Testimony #231**

Famous political figures, spent many evenings at victim's house, were friends with victim, worked with victim, confided in victim, and provided victim with the highest level knowledge and experience in public policy operations. In fact, when *Witness2021B* ran for Mayor of his City, it was actually a sting operation which indicted two other well-known political figures and exposed a political official-focused sex ring.

Some of those figures informed *Witness2021B* of their organized crime scheme, the participants and the operators. They invited *Witness2021B* to become part of their scheme.

As a White House and City Hall commended Federal patent-awarded inventor/CEO, *Witness2021B* has been government, and network newscast, documented as the first to invent, launch, operate and deliver the companies and technology that Google, Facebook and Netflix copied to create their, later, operations. Google, Facebook and Netflix, Tesla executives and VC's also happen to be the organizing, financing and beneficiary partners in the market manipulation scheme in this case. They have all known *Witness2021B* since college. Thus, *Witness2021B* had the opportunity to see them form their "*Silicon Valley Cartel*", **collude**, **conspire** and **organize against the government, the public and industry** in a manner which the tech oligarchs describe in their own emails as being based on "*...the Italian Mafia!*". Indeed, *The Silicon Valley Tech oligarchs have formed a collusion-based, law-violating, tax-evading, government-manipulating crime empire protected by famous politicians, whom they bribe!*

*Witness2021B* has been covertly reporting to GAO, FBI, FTC, SEC, FEC, IG OSC, California Fair Political Practices officials and Senators and others for decades.

His investigation work highlights include:

1974 – Advocated for and helped realize the creation of Dan Lowenstein's California Fair Political Practices Commission and helped conduct investigations for CFPC and task force groups. Peers included Paul Kangas, Jack Palladino, Sam Brown, Melvin Belli's investigators.

1978 - Undercover White-Collar Crime & Corruption Sting Operative

1988 - Placed in top percentile in Federal OPM Criminal Investigator 1811-C national test.

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Received first CIA solicitation.

1990 - American Society For Industrial Security - active coordinator

1990 - International Narcotic Enforcement Officers Association - active coordinator

1991 - California Association of Licensed Investigators - active coordinator

2000 - California Department of Consumer Affairs Investigator - active coordinator

2000-2008 - Investigative Consultant to Congressional and journalism organizations

2009- 2018 - Assisted agencies in one of the largest anti-corruption projects in the last decade

- Recipient of White House and Congressional Commendations and Federal Grants

- Instrumental in creating multiple federal laws and legal precedents

- Designed key sting-operation protocols

- Created first digital crowd-sourced law enforcement technologies

- Received multiple federal patents on IC and LE technologies

- Multiple high-profile white-collar case wrap-ups

His cases included notorious subjects that most people have seen in the news headlines.

Lately, by partnering with the messaging, media outreach, investigations and demands of

<https://socialsecurityworks.org> , <https://seniorsleague.org> , AARP, ICIJ and other related

organizations, and using [Streisand Effect amplifiers](#), torrents and mass social media processing,

This applicant, and his peers were able to get the heads of the Social Security Administration, the heads of The U.S. Government and the Attorney General fired from their jobs for corruption and abuse of public funds.

Nobody should tolerate political bullies that collude to abuse the public! Most members of the public, the non-corporate news media and community groups know that this level of corruption exists. You can see indisputable proof of these assertions in the documentary film:

[http://focus-book.com/public/HOW\\_POLITICAL\\_CORRUPTION\\_WORKS.m4v](http://focus-book.com/public/HOW_POLITICAL_CORRUPTION_WORKS.m4v)

[http://newsplus007.com/public/HOW\\_POLITICAL\\_CORRUPTION\\_WORKS.m4v](http://newsplus007.com/public/HOW_POLITICAL_CORRUPTION_WORKS.m4v)

... and at most streaming video outlets.

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1 Due to the effectiveness of Applicant's associates anti-corruption efforts, public officials  
2 have engaged in reprisal/retaliation attacks on Applicant and those officials engaged in felonies by  
3 doing that.

4 In the Solyndra/Silion Valley Cartel matter, *Witness2021B* did "*too good a job*" and broke  
5 up one of the largest corruption matters in America with roots that ran all the way to the Oval  
6 Office. The FBI raid on Solyndra was only the tip of the iceberg. Energy and Media Industry crimes  
7 like these have a SIX TRILLION DOLLAR upside if the crooks can pull them off.

8 The matter illuminated an organized crime scheme, in violation of RICO, anti-trust and  
9 other laws, between major public officials, Silicon Valley tech oligarchs and their operatives. Mr.  
10 Rusco and his investigation team at the United States Government Accountability Office (   
11 <http://www.gao.gov> ) spent significant time interviewing the witness. GAO and Congress then  
12 published a series of reports condemning the actions of the U.S. Department of Energy and their  
13 manipulations of taxpayer funds. Congressional staff asked *Witness2021B* to attempt a new kind of  
14 activist public-interest lawsuit against The U.S. Government and the individual executives of the  
15 GOVT. The litigation was won by *Witness2021B* and his investors and they received the remand  
16 they sued for. The case was also "won" in that it achieved it's goals to make history, set new legal  
17 precedents, put the corruption process on public record and prove that *Witness2021B* HAD been  
18 targeted for payback by government officials "*infected with corruption*". (<http://www.pacer.gov> )

19 The United States Congress had awarded *Witness2021B*, and his team, a commendation and  
20 a multi-million dollar federal contract to build America's energy "back-up" plan should the Middle  
21 East oil interests '*go sideways*', as they, indeed, have.

22 Documents, NDA's, emails and other evidence has proven that *Witness2021B* has had a  
23 relationship with the Department of Energy, and their labs, since, at least 2000. FBI agents Richard  
24 Auerbach, Peter D. Cair, Patricia Rich, Charles Brennan and William Wadman should be able to  
25 provide information about the oldest FBI contacts. Victim even had connections with local FBI  
26 Hero Mark Felt (known as 'Deep Throat' in the Watergate case) who lived near him. Reporters Ed  
27 Montgomery, Leslie Wayne, Carol Leoning and other well-known reporters have records which  
28 will verify some of the earliest investigation work by *Witness2021B*. Recent FBI discussions are

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1 documented in the FBI building logs. The Federal report entitled: ***San Francisco's Corruption***  
2 ***Culture*** (Available as an additional attachment document) goes into great detail about the organized  
3 political crime activities in the region.

4  
5 Witness2021B and his engineering team, as early as 2005, had informed the Department of Energy,  
6 in writing that, as Lithium ion batteries age, the 'dendrite defects' in their internal chemistry cause  
7 the batteries to constantly increase their tendency to blow up. This was proven via x-ray analysis of  
8 lithium ion batteries, particularly those from Panasonic that are used by Tesla Motors. This data was  
9 intentionally covered up by White House and Department of Energy executives because they  
10 wanted those "trillions" of dollars of profits in their pockets from the *fabled* Afghanistan mining  
11 fields.

12 External forces, moisture, ambient energy waves and other factors, increase their tendency  
13 to self-ignite. Department of Energy Secretary's of Energy, their staff, White House and CIA  
14 executives have been proven, via their public stock brokerage records, to own lithium ion battery  
15 companies and child labor rare earth mining interests.

16  
17 That is why they cover up the dangers of toxic lithium ion (the burning smoke of which causes  
18 cancer, brain and fetus damage) and sabotage efforts to market fuel cells, ultra caps, nicad batteries  
19 and competing alternative energy storage: in violation of anti-trust laws.  
20

21  
22 Secretary of Energy Jennifer Granholm's Proterra Buses are now blowing up, Tesla is  
23 known for blowing up, Bolt's are now blowing up. Ener1 batteries destroyed millions of dollars of  
24 Fisker's when they got wet... The U.S. Government has hundreds of reports proving this to be a  
25 fact.  
26  
27  
28



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AS LITHIUM ION BATTERIES AGE, THE DENDRITE DEFECTS IN THEIR INTERNAL CHEMISTRY CAUSE THE BATTERIES TO CONSTANTLY INCREASE THEIR TENDENCY TO BLOW UP.

EXTERNAL FORCES, MOISTURE, AMBIENT ENERGY WAVES AND OTHER FACTORS, INCREASE THEIR TENDENCY TO SELF-IGNITE.

DEPARTMENT OF ENERGY SECRETARY'S OF ENERGY, THEIR STAFF, WHITE HOUSE AND CIA EXECUTIVES HAVE BEEN PROVEN, VIA THEIR PUBLIC STOCK BROKERAGE RECORDS TO OWN LITHIUM ION BATTERY COMPANIES AND MINING INTERESTS.

THAT IS WHY THEY COVER UP THE DANGERS OF LITHIUM ION AND SABOTAGE EFFORTS TO MARKET FUEL CELLS, ULTRA CAPS, NICAD BATTERIES AND ALTERNATIVE ENERGY STORAGE.



Witness2021B asks to end this cover up that allows corrupt politicians to profiteer on the death of Americans!

The United States Patent Office had also awarded *Witness2021B* one of the historically largest set of patents on a new, entirely produced-in-the-USA, energy technology per <http://www.uspto.gov>

These technologies competed with the corrupt overseas rare earth mining schemes owned by California Senators, Department of Energy Executives, White House staff and the Silicon Valley tech Cartel.

*Witness2021B* has been a provider, advisor and/or advocate in almost every major current federal case against the Silicon Valley Cartel since the federal "no poaching" lawsuit against the Cartel.

( Case #'s **11-cv-2509** and **5:2011cv02509** and **1:10-cv-01629** and **1:10-cv-02220** ). These cases, prove that the Silicon Valley Cartel colludes to harm the public and monopolize industries.

State-sponsored "hit-jobs" were ordered, operated and financed by government officials in order to engage in revenge, reprisal and vendetta, against *Witness2021B* because of his help to Federal investigators and Congress in these investigations. Those attacks fully incapacitated the victim.

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1 In his public life, he has spent decades proving that nothing is "impossible" and that one is "only  
2 limited by their imagination" per his reference letters from clients and employers. Over the course  
3 of his work, he has assembled a global force of some of the world's top engineering, science,  
4 physics, programming, operations and logistics experts. He, and his peers, can respond instantly for  
5 disaster relief, market shifts and new global solutions demands. Solving global challenges with  
6 novel new innovations and conceptual-blockbusting program management.

7 His career has been focused on solving the world's greatest challenges. He has received  
8 awards, commendations, issued federal patents and industry acclaim for his networking,  
9 transportation, housing, medical, communications, energy and other technologies that he invented,  
10 built and marketed globally. Millions of user around the world deploy technologies first created,  
11 produced and patent-awarded to him.

12 His hundreds of letters of reference are from the White House, Mayor's, Fortune 500 CEO's  
13 and other well known leaders. He is renown for his life-time provision of service to his community  
14 and his nation.

15 His work stopped in 2008 when the attacks began. Many of the attacking operatives have  
16 been identified by name and **the FBI has been asked to interview them and confirm who was**  
17 **paying and directing them.** White House, Congressional and co-worker whistle-blowers, as well as  
18 recent Chinese, Russian and Syrian hacks have also cross-confirmed the attackers and their  
19 directives.

20 The victim has, for years, filed all of the proper forms, gone "through proper channels" and  
21 inquired as to next-steps from officials at the highest levels. For his efforts he has been rewarded  
22 with cover-ups, lies, obfuscation, stone-walling and avoidance. The victim now has one of  
23 America's largest collections of "Finger-Pointing" letters from government agencies and officials,  
24 each correspondence, essentially, saying: "Oh, it's not us go try DOJ or...(FBI, SEC, GAO..(Insert  
25 agency name here)...". No government body will step up to resolve the issue or allow their IG to  
26 investigate, or let "302 reports" get written for interviews that never happen. It is the RUN-  
27 AROUND on an epic scale.

28 Today, in San Francisco, arrested, indicted City Hall public officials, some of whom

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1 *Witness2021B* helped uncover, get paid \$44,000.00 per month by the government even though they  
2 are arrested criminals. San Francisco also pays homeless people \$60,000.00 per year to sleep in a  
3 tent in front of City Hall. Today, in Washington DC, arrested, indicted Congress-people, some of  
4 whom *Witness2021B* helped uncover, get paid \$150,000.00 per year by the government even  
5 though they are arrested criminals.

## EXHIBIT 7 – Crony Corruption Goes High Tech

After a year of waiting and being assured that their loan application was complete and good, XP Vehicles received a letter in August stating simply that their loan application under the Advanced Technology Vehicles Manufacturing (ATVM) Program had been rejected. No reasons were given in the letter and only after several attempts at phoning the ATVM office were they able to receive the reasons orally. Most were not even applicable to the loan application and did not reflect what was included in the submission or what, in fact, was available for review, clearly visible on our website and in the extensive media about our company.

The rejection appears to have been driven by political and competitive market interests and not technical or innovative valuation.

The XP Vehicles car goes an almost unlimited range via hot-swap cartridges, costs less than \$20,000, uses no gasoline, is easy to repair and build, saves lives better than any other car, is faster than competing solutions, does not require an extension cord, uses electricity and creates green jobs. The factory can be built quickly and at very low cost and, in fact, partially already exists via our manufacturing partners. The company already has thousands of customers lined up who want to buy our unique and very “green” car. The company hand delivered letters from those customers to the DOE ATVM office in Washington DC in 2008. The company currently has no significant debt and the company leaders have been contributing their time and resources for many years based on positive feedback received repeatedly by Department of Energy (DOE) loan reviewers and staff. The company won a semi-finalist position in the *Forbes: America’s Most Promising Companies* contest.

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1  
2 Certainly company officials are not claiming that their vehicles will solve all of our energy  
3 problems. However with each car that is sold, we will help reduce our reliance on imported fuel by  
4 putting a vehicle on the road that uses absolutely no gasoline. This vehicle is truly using “advanced  
5 technology” – a major goal of this loan program. In addition, with a company that has no current  
6 debt, several patents, and thousands of interested customers, the company asserts that DOE’s  
7 financial risk in investing in our technology would be extremely low.  
8

9  
10 **We would understand a rejection of this loan application if legitimate reasons were given, but**  
11 **they were not.** One of the reasons given was that our car does not use E85 gasoline. No, this car  
12 uses NO gasoline which we thought is a goal our country should want to attain. Another reason was  
13 that we were not making millions of cars. Our marketing plan did not support that nor did the  
14 funding levels we requested, AT THIS STAGE. But we stated that we hoped to grow to make as  
15 many cars as Ford, GM or any other competitor but that we intended to grow, “in stages” as any  
16 smart business would. DOE also stated that XP was not planning to sell cars to the government  
17 which is 100% false and clearly stated in our application that the core sales plan of the company is  
18 based on government fleet sales. We cannot help but wonder if DOE even read the application.  
19 Finally, and another example of a failure to read the application, was that DOE asserted our factory  
20 cost estimates were too low because the metal body fabrication systems were not calculated high  
21 enough. XP Vehicles use no metal fabrication in its bodies.  
22  
23

24  
25 XP Vehicles sent a follow up letter to Energy Secretary Steven Chu with the following questions  
26 that still remain unanswered and unexplained:

27 “  
28

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- 1 1. DOE reviewers never even talked to the founder, inventor, engineers, project leads or  
2 primary contractors to obtain additional information. We even were told over and over that  
3 everything in our application was complete and that nothing was needed. “Everything is on  
4 track” was an expression repeated to the company by DOE reviewers. This is despite the  
5 fact that the reasons given for our rejection did not reflect the technology being used and  
6 therefore the ATVM reviewers did not understand our concept and product. Why was no  
7 one at XP Vehicles contacted? Why was the staff at DOE during the course of the year  
8 positive about the outcome and never asked for additional information?  
9  
10
- 11 2. Rejection comments supplied by Chris Foster of DOE and third party press seem to be  
12 unrelated to the business of the company and have no foundation in fact. Why is that?  
13  
14
- 15 3. One of the main reasons given for the rejection was the fact that our vehicles do not use E85  
16 gasoline. If that was true, why did competitors Tesla & Nissan get approved funding? Their  
17 vehicles also do not use E85. Additionally, in reviewing the transcripts of the two Public  
18 Meetings held to brief stakeholders on the loan program, **not one DOE speaker stated that**  
19 **E85 was a required component.**  
20
- 21 4. While it is true that we do not wish to use carcinogenic gasoline, (Here in California we  
22 have a sticker on every gas pump that warns that filling your tank is likely to expose you to  
23 cancer), at no point was E85 gasoline ever mentioned, discussed, commented on or  
24 requested. In fact the topic was particularly avoided by DOE staff. Why not?  
25
- 26 5. Another rejection point was that we were not planning to make enough cars. This is false.  
27 The company would like to build and sell more cars than any other car company. We are  
28

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1 fully willing to produce millions of vehicles if provided with the appropriate funding as it  
2 has quantified millions of fleet buyers for its vehicles. However, no DOE entity ever asked  
3 us to adjust, discuss or amend our numbers and we were more than willing to adjust those  
4 numbers if anyone had even bothered to ask. One must start out with small steps and we  
5 planned to ramp up to a massive number over time. To suggest that one do otherwise would  
6 demonstrate questionable judgment. What is the validity of this comment by the reviewers  
7 based on?  
8

- 9 6. We provided \$100 million+ of asset collateral opportunity for only a \$40M loan. To repeat,  
10 we provided over TWICE the collateral of the value of the loan. How is this not as secure of  
11 a structure as any of the other applicants?  
12
- 13 7. We had selected a primary, secondary and additional back-up factory buildings that DOE  
14 said would be fully NEPA compliant yet Tesla had no building, planned to build a structure  
15 which was not possible to meet Section 136 parameters in time, still does not have a  
16 building yet they received funding. How did that happen if the Section 136 rules required a  
17 NEPA compliant building upon application filing?  
18
- 19 8. We were told that we were rejected because we were not planning to sell cars to the  
20 government. **This is 100% false.** The core sales plan of the company is based on  
21 government and commercial fleet sales. Why did your reviewers say this?  
22
- 23 9. Additionally we were told that electric motors and batteries were considered by the  
24 reviewers to be too futuristic of a technology and not developed for commercial use even  
25 though they have been in use in over 40 industries for over 20 years, including by NASA.  
26 What is the rationale for this argument?  
27  
28



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10. Almost every other part of the XP car was to be purchased from existing commercial sources with multiple points of supply so it is not possible to see how a reviewer might think the vehicle had any significant technical acquisition hurdles. Why does DOE assume that the following companies with whom we would be contracting could not perform the following responsibilities:

10.a. Deloitte & Touche to provide auditing and reporting of financial data.

10.b. Autodesk or Microsoft to deliver the process and design software.

10.c. NEC, Intel or the other leading electronics companies in the world to build our controllers.

10.d. Roush Automotive, one of the most successful automobile electronics groups in the world, to build the electronic module.

10.e. US National Lab system to solder a box together.

10.f. Over 100 other major supplier companies that have been building parts for the auto, aerospace and industry for decades to deliver the component parts for our vehicles.

11. The primary purpose of this loan program, XP was told by its authors, was to develop advanced technology and further reduce our dependence on gasoline. The XP Vehicles car uses no gasoline and gets over 125 miles per battery charge. How is this not a direct conflict with the precepts of the Section 136 law?

12. XP was also told that its factory cost was too low because the metal body fabrication systems were not calculated high enough but the reviewers apparently did not even pay

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attention to the fact that XP uses no metal fabrication in its body. What was the rationale in making such an erroneous comment?

13. Reviewers also stated that the car was a "hydrogen car" which it is not. It is an electric car. Why did they say that?

14. In what ways were the following documents actually reviewed? The ATVM office stated that they "lost our documents" twice. Why?

Documents XP vehicles submitted to DOE:

- Detailed financials that cost the company almost \$200,000 to prepare;
- Metrics that demonstrated that the XP car can save millions of lives per year and that it was safer than any vehicle;
- Metrics that demonstrate that a gasoline/hybrid vehicle is dangerously carcinogenic when filled at a gas station compared to an XP Vehicle;
- Engineering and IP metrics that beat every competitor on price, range, safety, TOC, efficiency, toxic safety and hundreds of other points;
- Examples of work from \$3M of cash and person-hours previously invested by founders, DOE & partners;
- Lists of top auto and aerospace corporate partners, staff and resources, on stand-by, equaling thousands of people in all groups combined;
- Validation of a deep team of core staff that have been developing the project and parts of the project for 3-15 years part time;
- Samples of extensive international positive press coverage;
- Proof of a market opening timed with tax and national imperative incentives that created a dramatic window for success;

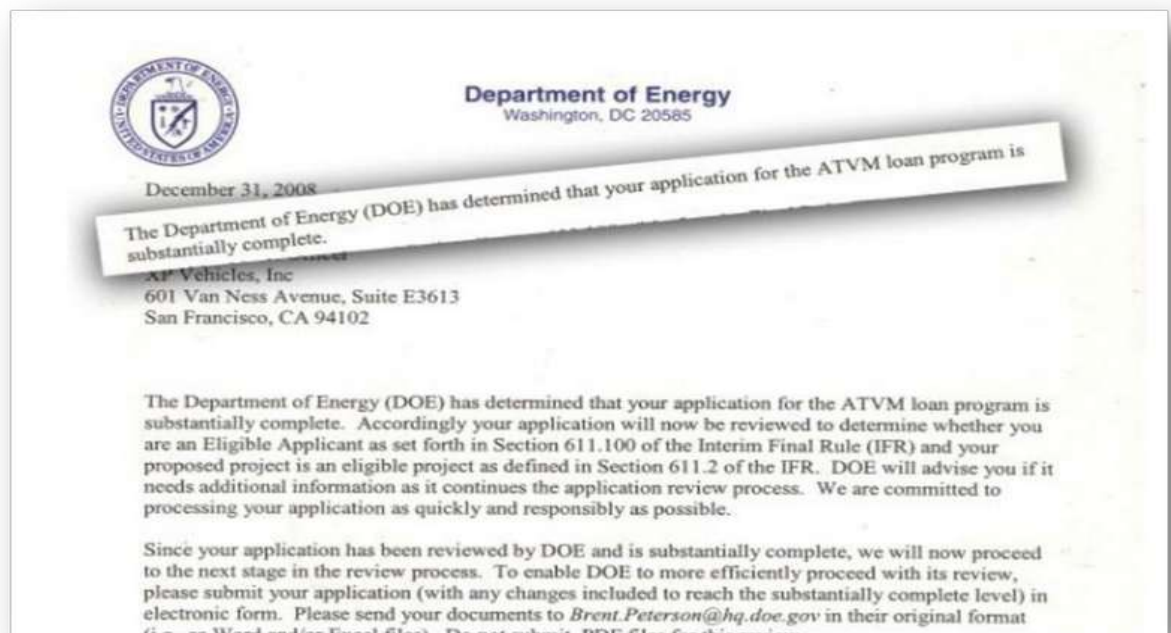
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- 1 • Proof that XP was the lowest overhead car company in the market which equates to the
- 2 best chance for profit and return funds;
- 3 • Samples of an in-house created online process management architecture;
- 4 • CAD designs, engineering plans and manufacturing plans;
- 5 • A detailed website;
- 6 • A detailed path to \$1.5B within 5 years or less from a less than \$100M investment;
- 7 • Examples of dozens of prototypes as seen in the photograph on the BUILDS page of our
- 8 website;
- 9 • Numerous patents and issued trademarks;
- 10 • Large pending portfolio with third party valuation and validation reports valuing IP at
- 11 over \$100M;
- 12 • People: Senior Scientists, Chemists & Engineers from Top University & Federal Labs,
- 13 including staff that has built and delivered millions of vehicles to the consumer market;
- 14 • Partners: Federal, University, Fortune 500, Private Research Organizations;
- 15 • Written Customer inquiries from a massive national customer base of qualified retail leads
- 16 and 1.2M of commercial unit opportunities equaling a \$1.5B+ opportunity. Also submitted
- 17 an extensive package of letters from each customer candidate;
- 18 • Contracts: Federal Contract fully executed and MOU's executed;
- 19 • Awards/Commendations: Congress, DARPA;
- 20 • Research Data: Over 200+ technical research documents & 15+ years of research;
- 21 • Know How: Over 22,000+ man hours of development;
- 22 • Market data, studies and plans;
- 23 • Over 100+ documents of industry study;
- 24 • Unique access to Federal Labs & leased facility options;
- 25 • and other supporting materials.
- 26
- 27
- 28

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1  
2 After several more attempts at receiving more clarification from the ATVM office, the company  
3 received a follow up letter of explanation for the rejection. While more explanatory than the first,  
4 the reasons still are very questionable and the process greatly lacking in transparency. Below are  
5 additional questions that the company is raising, along with the ones above that still have not been  
6 answered.

7  
8  
9 In the October 23, 2009 follow up letter, Mr. Lachlan Seward states that the XP Vehicles  
10 loan application was deemed Substantially Complete on November 10, 2009. **This is**  
11 **completely false** as XP Vehicles received a letter on December 31, 2008 states that the  
12 application was substantially complete.



25 Additionally, the NEPA for XP Vehicles had been reviewed, edited and approved  
26 by DOE National Environmental Protection Act (NEPA) staff (Matthew  
27 McMillen) at the beginning of 2009  
28

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1 The letter also states that “extensive review” was conducted yet (as mentioned above) not  
2 one XP Vehicle company official, engineer, designer, investor, technician or anyone else  
3 who had designed and developed the car was contacted by DOE to answer questions and  
4 provide more information. It seems incredulous that after conducting an extensive review  
5 that DOE would not have at least one question about the application for any of the technical  
6 staff, or the founder who flew to the DOE in Washington, DC, twice, and was told by DOE  
7 staff, on each occasion, that “no additional information was needed and everything was in  
8 hand to finalize the application”.  
9

10  
11 The first reason given for the rejection was that the proposed vehicle is at a “development  
12 stage” and not ready for commercialization. Yet applications that have already been  
13 approved, we have been told, have had less plans or hard development data. These awardees  
14 also had the same three-year timeframe in their proposals, and one even went into 2013. We  
15 also find this contrary to the Administration’s stated goal about electric vehicles. According  
16 to a DOE spokesman, the Administration “shares the goal of ensuring that the program  
17 (ATVM) is flexible enough to account for the full range of available technologies.”  
18  
19

20  
21 The second reason was the project’s impact on fuel economy of the US Light Duty Fleet  
22 over time was weak. This was never discussed with our team at any point of the process.  
23 However, it is surprising to us how a vehicle that is lighter than any other applicant by half,  
24 safer than any other applicant by many times and beats the metrics of every other applicants  
25 could not have exceeded every applicant on any comparison to Light Duty fleet metrics, a  
26 market that was core to our business plan. Our fleet sales were targeted directly at the Light  
27 Duty fleet so we find this reason to be confusing at best.  
28

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1  
2 The third reason cited in the letter was about the use of “advanced fuels.” First of all, at no  
3 point did anyone from DOE ask about or discuss with our technical staff our fuel plans. The  
4 letter further goes on to say that our use of hydrogen was one of the reasons that our  
5 application was being rejected. **Yet hydrogen is non-essential to our vehicle.** The  
6 hydrogen tank is rather an optional and stand-by power system for our electric vehicles.  
7 Further we fail to see how DOE could state that hydrogen is an “impractical and unproven  
8 energy source” in light of the fact that Honda and BMW are already shipping cars using that  
9 fuel source. But again, we must reiterate that the use of hydrogen is not an essential  
10 component of our vehicles and had DOE asked us about this fuel source, we could have  
11 explained that to them.  
12

13  
14  
15 Finally, the letter states that the XP Vehicles petroleum use reductions were unrealistic. We  
16 are most confused about this point as **our car uses absolutely no gasoline.** How could our  
17 reductions be unrealistic? Is this not a goal of the Obama Administration?  
18

19  
20 The company hired Ford Motor Company’s senior systems engineer to validate the final  
21 vehicle numbers submitted in the base response and provided numbers in support of that  
22 data produced by Sandia National Laboratories. How could those entities have provided  
23 numbers which the ATVM office could have interpreted so negatively for a vehicle which  
24 weighs less, goes farther and requires less energy storage than any other submitted vehicle in  
25 the entire set of applicants to date? How could the ATVM reviewers never even submit a  
26 question to the XP technical team about any of these metrics?  
27  
28

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1 Why have none of our FOIA requests been responded to?”

2  
3 In summation, these clarifying reasons for rejecting the XP Vehicles ATVM loan  
4 application are still confusing, not applicable in many cases and unwarranted when  
5 considering those applications that have been approved. The listed points appear to have no  
6 foundation in facts relative to our design and we again question why there was no  
7 communication from DOE with the developers of the vehicle over a year.  
8

9  
10 Further we have been told that competing larger companies were given much counseling,  
11 guidance, feedback and opportunity to “tweak” their applications by DOE. These companies  
12 submitted their applications later than XP Vehicles and were awarded funding. Our question  
13 is then why did Carol Battershell, DOE Senior Advisor state during the December 1, 2008  
14 Public Meeting that “And that might lead one to believe that applying earlier is better than  
15 apply later.” When the program was first announced, that indeed was the guidance given –  
16 first come, first served – so scores of smaller, electric car companies and suppliers submitted  
17 their applications. Yet the rules changed mid-way through the process to allow larger  
18 automotive companies who did not submit their applications first to send them in and now  
19 they are being funded.  
20  
21

22  
23 Finally, we were very disappointed to read in the September 23, 2009 issue of E&E News  
24 that Secretary Chu had suggested in June that the Administration was hoping that GM and  
25 Chrysler would be able to participate in the (ATVM) loan program. “There is money there, I  
26 wouldn’t say set aside, but let’s just say we are trying to stretch those dollars as far as we  
27 can.” This forces us to ask whether these funds are being set aside at the expense and loss of  
28



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1 smaller, more advanced technology electric car companies and suppliers who are requesting  
2 billions less in guaranteed loans and who are offering more forward-thinking and advanced  
3 projects to help us move away from our dependence on oil.

4  
5 This is only a partial list of the problematic issues that we experienced with the ATVM  
6 group at DOE.

7  
8 Every year since 2000 our research group has checked in with consumer car owners and  
9 auto industry suppliers. The bottom line has always been that no consumer electric car market will  
10 EVER happen until every consumer can charge their car at their home garage or home apartment  
11 parking spot. NOBODY, in any significant numbers, is going to drive many miles to a charging  
12 station, wait in line to get to the charger and then wait more than 4 minutes for their car to charge.  
13 The current time to charge most electric cars is 40 minutes with all of the fussing around accounted  
14 for.

15 We proposed a hot-swap battery system that any consumer can use, without driving to some  
16 special location. A consumer can hot-swap a wheeled battery in less than two minutes.

17 Senators and government officials don't like that because they bought stock market  
18 investments in the ways that don't work. Those White House and Department of Energy officials get  
19 bribes and stock market payola from Proterra, Ener1, Tesla and the old school suppliers, so they  
20 will not allow non-lithium-ion batteries and they will not allow fuel cell and ultra-capacitors to  
21 exist. Those politicians will not allow the only solutions that work to get to market. Here is what we  
22 told the Department of Energy and the White House, in writing for the last decade. With revelations  
23 like these:

24 **MORAL HAZARD? Fed President Active Trader of Stocks...**

25  
26 **Boston Official Who Warned on Real Estate Was Active REIT Trader...**

27  
28 **Agency buying bonds of companies that don't seem to need central bank's help...**

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1 ...it is clear the government officials, especially Department of Energy bosses, don't care  
2 about their salaries, they are entirely motivated by their stock market holdings, which compete with  
3 the public.

4  
5 Yes, Department of Energy staff get paid by special interests via stock market insider trading and so  
6 those energy executives sabotage any company that competes with their lithium ion battery mining,  
7 assembly or marketing payola.

8 The United States has about 100,000 public chargers, far fewer than Europe and China. It  
9 needs 10 times as many, auto experts say, to complete the switch from combustion engine vehicles.

10  
11 Over the past year, the electric vehicle charging industry has been swept up in a Wall Street gold  
12 rush because of growing optimism about electric cars and trucks.

13  
14 In President Biden's vision of a green future, half of all new cars sold in 2030 will be electric. But  
15 something really basic is standing in the way of that plan: enough outlets to plug in all those cars  
16 and trucks.

17  
18 The country has tens of thousands of public charging stations — the electric car equivalent of gas  
19 pumps — with about 110,000 chargers. But energy and auto experts say that number needs to be at  
20 least five to 10 times as big to achieve the president's goal. Building that many will cost tens of  
21 billions of dollars, far more than the \$7.5 billion that lawmakers have set aside in the infrastructure  
22 bill.

23  
24 Private investors are pouring hundreds of millions of dollars into building chargers, but the business  
25 suffers from a chicken-and-egg problem: Sales of electric cars are not growing fast enough to make  
26 charging profitable. It could be years before most charging companies break even, let alone mint big  
27 profits like Exxon Mobil and Chevron.

28

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1 Fast chargers — ones that can fill up an electric car battery in 20 to 40 minutes — cost tens of  
2 thousands of dollars but are typically used less than humdrum gas pumps. Yet the auto and energy  
3 industries need to build them to reassure people that they won't be stranded in an electric car with  
4 no plug in sight.

5  
6 "E.V. charging infrastructure is the single biggest barrier to E.V. adoption," said Asad Hussain, a  
7 senior analyst at PitchBook, a research firm. "You talk to anyone who's on the fence about buying  
8 an E.V. and the No. 1 concern that comes to mind is range anxiety."

9  
10 The European Union, which is further along in electrifying cars, had nearly 200,000 public charging  
11 points last year. China, where electric cars are even more common than in Europe, had more than  
12 800,000 in 2020.

13  
14 European and Chinese officials have offered better incentives and imposed tougher regulations in  
15 part because they want to win a global race to build the cars and trucks of the future. U.S. policies,  
16 including the infrastructure bill, have been more modest because most Republicans and some  
17 Democrats oppose the regulation and spending needed to quickly ditch fossil fuels.

18  
19 Soon, even \$7.5 billion won't be enough to lay the groundwork for the electric age, Nick Nigro,  
20 founder of Atlas Public Policy, a consulting and research firm based in Washington, said about the  
21 proposed federal spending on charging stations.

22  
23 "Is it sufficient? No," he said. "But it gets things going."

24  
25 Most drivers today plug in their electric cars at home, and only occasionally use public charging  
26 stations. But those stations will be crucial, especially to those who live in apartments and people  
27 who drive long distances.

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1 For years, start-ups, automakers and other companies have been slowly building chargers, mainly in  
2 California and other coastal states where most electric cars are sold. These businesses use different  
3 strategies to make money, and auto experts say it is not clear which will succeed. The company with  
4 the most stations, ChargePoint, sells chargers to individuals, workplaces, stores, condo and  
5 apartment buildings, and businesses with fleets of electric vehicles. It collects subscription fees for  
6 software that manages the chargers. Tesla offers charging mainly to get people to buy its cars. And  
7 others make money by selling electricity to drivers.

8  
9 Once the poor cousin to the hip business of making sleek electric cars, the charging industry has  
10 been swept up in its own gold rush. Venture capital firms poured nearly \$1 billion into charging  
11 companies last year, more than the five previous years combined, according to PitchBook. So far in  
12 2021, venture capital investments are up to more than \$550 million.

13  
14 On Wall Street, publicly traded special purpose acquisition companies, or SPACs, have struck deals  
15 to buy eight charging companies out of 26 deals involving electric vehicle and related businesses,  
16 according to Dealogic, a research firm. The deals typically include an infusion of hundreds of  
17 millions of dollars from big investors like BlackRock.

18  
19 “It’s early, and folks are trying to wrap their heads around what does the potential look like,” said  
20 Gabe Daoud Jr., a managing director and analyst at Cowen, an investment bank.

21  
22 These businesses could benefit from the infrastructure bill, but it is not clear how the Biden  
23 administration would distribute money for charging stations.

24  
25 Another unanswered question is who will be the Exxon Mobil of the electric car age. It might well  
26 be automakers.

27  
28 Tesla, which makes about two-thirds of the electric cars sold in the United States, has built

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1 thousands of chargers, which it made free for early customers. The company could open its network  
2 to vehicles made by other automakers by the end of the year, its chief executive, Elon Musk, said in  
3 July.

4  
5 Volkswagen also owns a charging network, Electrify America, which is already available to all  
6 makes of cars. In Europe, Volkswagen, BMW, Ford Motor, Daimler and other automakers jointly  
7 own a charging company called Ionity. Drivers pay fees to charge in both cases, but some  
8 automakers offer free charging for a few years to entice car buyers.

9  
10 Energy giants like BP and Royal Dutch Shell have gotten into the business, too, by buying charging  
11 companies in Europe and the United States.

12  
13 And 14 electric utilities from Maine to Texas have formed the Electric Highway Coalition to build  
14 stations at intervals of 100 miles or less. Utilities elsewhere are also building chargers, as are cities  
15 like Los Angeles and New York.

16  
17 They are all competing in a tiny market: Less than 4 percent of new car sales and less than 1 percent  
18 of vehicles on U.S. roads are electric.

19  
20 Charging companies claim they can succeed even if it takes years for electric vehicles to take over.  
21 Some businesses like ChargePoint have been around for more than a decade, while others raising  
22 money don't have much of a track record.

23  
24 The chief executive of ChargePoint, Pasquale Romano, says his company avoids some costs by  
25 using contract manufacturers to build equipment and selling stations to employers who own electric  
26 vehicle fleets, retailers and others, who also buy software and maintenance subscriptions.

27  
28 "Everyone thinks this can go fast, and it can't," Mr. Romano said. "You have to get in and start

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1 pedaling to help shape what it looks like.”

2  
3 Volta, a smaller charging company, places chargers near the entrances of retailers like Whole Foods  
4 Market and Walgreens. The chargers show ads, generating revenue, and the stations pay for  
5 themselves within a few years, said the company’s president and a co-founder, Chris Wendel. “It’s  
6 a sponsored service brought to you by brands that care about what you’re doing.”

7  
8 But some companies have stumbled. In December, TPG Pace Beneficial Finance, a SPAC backed  
9 partly by TPG, the private equity firm, announced that it would buy EVBox, an Amsterdam-based  
10 maker of charging equipment, valuing the company at \$1.4 billion.

11  
12 In January, Jim Cramer, the host of CNBC’s “Mad Money,” said EVBox was his favorite charging  
13 company because it is an established player in Europe. Shares of TPG Pace Beneficial climbed to  
14 \$31 in February, from around \$10.

15  
16 But this month, the companies delayed the merger’s closing because EVBox has not yet released its  
17 audited financial statements for 2020. TPG Pace said in a regulatory filing that there was  
18 “significant uncertainty” about the deal’s completion, and its shares have fallen back to about \$10.

19  
20 A spokeswoman for EVBox declined to comment.

21  
22 Mr. Cramer no longer stands by the EVBox pick. “I suppose we put too much faith in the financials  
23 as presented to investors at the time,” he said in an email.

24  
25 Since the start of 2020, 16 proposed SPAC mergers have been canceled or withdrawn. And  
26 investors and regulators have raised questions about the optimistic claims made by executives and  
27 promoters of SPACs.

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1 Yet investors continue to pour money into charging. One charging company, EVgo, completed a  
2 SPAC deal and started trading in July. Trading in Volta started last month. Several other deals have  
3 been announced in recent months, including for Tritium, which makes fast chargers; Wallbox,  
4 which sells charging equipment, software and related services; and Allego, which operates a large  
5 charging network in Europe.

6  
7 Some investors think that charging cars might not be the best approach. Lithium ion batteries cause  
8 wars, corruption, genocide, mass rapes, child labor, unexpected fires, environmental damage,  
9 cancers, liver damage, worker deaths and other awful things.

10  
11 Last month, Ample, which aims to build stations where drained E.V. batteries are replaced with  
12 charged ones, raised \$160 million. Raed Masri, founder of Transform VC, an investor in Ample,  
13 said battery swapping would be better for people without a place to plug in their cars because it is  
14 much faster.

15  
16 “They need a quick energy delivery system, and only swapping provides that,” Mr. Masri said.

17  
18 Other investors are making lots of bets. Energy Impact Partners, a private equity firm based in New  
19 York, has invested in several charging networks, a repair app for charging stations and an app that  
20 optimizes charging.

21  
22 Cassie Bowe, a principal at the firm, said that with electric vehicle sales growing fast, it was urgent  
23 to build a network to support them. “There’s no more time,” she said. “We need this infrastructure  
24 fast.”

25       The reality is that the current plan can never work. There is not enough money, consumer  
26 interest, logistical embrace or other support for public chargers to ever be more than a feel good  
27 fancy. The consumer desire for speed-of-delivery increases over 10% per year. Nobody is going to  
28 put up with the wait, especially after sitting in rush-hour congestion every morning and night.



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1 Electric cars will never happen in any volume unless every home and apartment has a  
2 charger, the rates for the chargers are less than gasoline and the batteries or energy cassettes can be  
3 instantly hot-swapped. Department of Energy officials avoid this option, though, because it  
4 competes with their stock market holdings. Corruption in America will never end until Congress  
5 makes it illegal for a public servant, or their family, to own stocks!

6 Forensic data has proven that Applicant's records and decisions were altered by government  
7 staff and external hackers in an effort to harm Applicant in reprisal for his testimony to law  
8 enforcement as a witness, whistle-blower and advocate.

9 Applicant was a criminology student on the multi-campus "Core Curriculum" which was  
10 offered through Stanford, SFSU and Berkeley campuses. He lived on Chenery Street, in San  
11 Francisco, with Janet R. T. Who was the best friend of Kathryn Feinstein, daughter of the future  
12 mayor of San Francisco. Janet's mother worked for Dianne Feinstein. Kathryn Feinstein often  
13 stayed at Applicant's home and partied there in the hot tub in the back yard and in the downstairs  
14 living room. Where she told tales of San Francisco politics. This led to Applicant's recording and  
15 production of the investigative film series: "City Circus", about the characters in San Francisco  
16 politics.

17 Mayor George Moscone was then assassinated one day while Applicant was on the way to  
18 City Hall for a meeting at the Mayor's office. This assassination made Diane Feinstein Mayor of  
19 San Francisco and, later, a U.S. Senator.

20 Mayor Feinstein issued a large published proclamation to Applicant for his work on a major  
21 project for the City of San Francisco, a tribute to George Moscone viewed by millions of citizens  
22 and had Applicant produce many socialite events at City Hall for, and with, the Mayor's friend  
23 Charlotte Maillard.

24 Applicant was working on the 50<sup>th</sup> Anniversary Golden Gate bridge events but a rift  
25 developed between Applicants team and another group. The opposing group was being accused of  
26 embezzling Bridge District funds and was headed by two personal friends of Diane Feinsteins. The  
27 failures of the opposition group became national news as it was also backed by David Rockefeller's  
28 money man, who financed Diane Feinstein.

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1 At this time Applicant, had numerous law enforcement and intelligence credentials,  
2 commendations and certifications and was approached to assist with a sting operation involving  
3 some of those officials. The sting operation required that Applicant run for Mayor of San Francisco  
4 because only a mayoral candidate could have access to the proper people, information and  
5 proximity needed for such an operation. Department of Justice, FBI, California Fair Political  
6 Practices Commission and other entities had an interest in these task force-type efforts. The  
7 combined efforts resulted in one famous official being arrested for running an underage prostitution  
8 ring for San Francisco public officials, co-managed by a SFPD official and another candidate for  
9 mayor, associated with the old school North Beach mob, being run out of politics and having his  
10 young daughter removed by the police to protect her from attempted abuse. Both of the indicted  
11 officials had close relationships with Diane Feinstein.

12 Applicant ran the opening ceremonies of David Rockefeller's Embarcadero Center in San  
13 Francisco which Rockefeller, Feinstein and James Bronkema were key players in. James Bronkema,  
14 The head of the Golden Gate Bridge District had his mistress intermediate a potential "peace treaty"  
15 between applicant and his Cartel. He later sought to invite Applicant into the Bay Area political  
16 Cartel he ran and disclosed the insider scheme to Applicant, hoping to entice him. Bay Area VC  
17 Tom Perkins also made Applicant this offer and confirmed the existence, operation and scope of  
18 this Cartel which included famous politicians.

19 Subsequently, the Feinstein family became the investors, government financial agent,  
20 contractors, HR providers, staffing liaison, and friends for Elon Musk and managed the State and  
21 Federal gifts of billions of dollars of tax payer funds to Musk, which the Feinstein family profited  
22 from.

23 At the same time, Applicant was operating a U.S. Government funded electric vehicle  
24 manufacturing company and an energy production company that competed with Elon Musk's  
25 companies. Applicant contacted the Fremont, California NUMMI plant which Elon Musk had  
26 publicly stated he "had no use for NUMMI". Applicant had been in negotiations and had arranged  
27 the first request to re-task NUMMI. The Washington DC consulting group: "Eye On Washington"  
28 and CBS News 60 Minutes Producer: Bob Simon, then had communications with Diane Feinstein's

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1 Chief of Staff who threatened Applicant against having anything to do with the NUMMI plant.  
2 Subsequently Elon Musk announced he had stepped back in and was taking over the plant in a  
3 surprise announcement MC'd, in person by Diane Feinstein, whose family was managing the  
4 leasing, hiring and contracting for the NUMMI and next door Solyndra buildings.

5 Applicant had received a Congressional commendation for his work.

6 Subsequently, the FBI discovered ( confirmed via a declassified congressional report) that  
7 Daniel Jones, a former intelligence committee staffer for Sen. Dianne **Feinstein**, hired **Fusion GPS**  
8 and Christopher Steele to push the Russian story and used Fusion GPS, and other services to put hit-  
9 jobs on people for Feinstein. Additionally, the FBI discovered that high level Chinese spies worked  
10 for Feinstein, including driving her around. Fusion GPS, Media Matters, Gawker Media, Gizmodo  
11 Media Google and Youtube were subsequently found to have been hired by "a famous politician" to  
12 operate over \$30M of character assassination reprisal media defamation attacks against Applicant to  
13 punish him for helping law enforcement in these cases. It is well known that Feinstein, Pelosi,  
14 Harris, Reid and other Senators commonly use intelligence agency resources and "dirty tricks" to  
15 attack citizens they are mad at.

16 Applicant was cooperating with agency investigations at this time.

17 Applicant, at this time, discovered that he had been exposed to toxic materials, possibly  
18 intentionally as "political poisoning" (ie: The Salisbury Poisonings and the Alexander Litvinenko  
19 poisoning), as a reprisal tactic, from his work with The U.S. Government and Kaiser laboratories.  
20 Applicant filed for his benefit rights in 2007, which he had full credits for, but political officials  
21 from Senate offices ordered those funds frozen and used intelligence agency dirty tricks to  
22 manipulate and alter government records. The "Solarwinds", "Supernova", "Spectre" and hundreds  
23 of other hacks show that the very servers that Applicant's records were on were, in fact, penetrated.

24 Intelligence agency staffers manipulated Applicant's filed benefits applications with SSA,  
25 HUD and other agencies, in order to cut off his funds in reprisal for Applicant's assistance to  
26 corruption investigations.

27 Congressional officials then assisted Applicant and his peers with a first-ever federal anti-  
28 corruption lawsuit. This case set many new legal precedents. Applicant's team won the lawsuit

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1 proving that government agencies “infected by corruption” had manipulated, blockaded and stone-  
2 walled Applicant’s funding.

3 SSA staff and officials from the SSA San Francisco office and the notorious “Mario U” SSA  
4 staff attack against Applicant have shown that some SSA staff ran political reprisals on Applicant.  
5 History has shown that some Bay Area SSA staff since 2007 have gone on to work for politicians in  
6 dispute with Applicant or for ANTIFA-like political activism groups that advocate attacks.

7 Further details in the matter can be viewed at:

8 <http://www.how-political-corruption-actually-works.com>

9 and

10 <http://american-corruption.com>

11 ... and hundreds of thousands of other public transparency sites.

12  
13 Victim and his peers have aggressively pushed for the creation of an FTC task force to take  
14 on Silicon Valley tech monopolies. They have submitted thousands of pages of reports about  
15 Facebook, Tesla, Paypal and Google monopoly crimes based on data from San Francisco insiders  
16 at, and around, those companies.

17 The Federal Trade Commission has now launched a task force to monitor competition in the  
18 US’s technology markets, commissioners announced. In reaction, the Silicon Valley oligarchs are  
19 attempting every bribe, favor, influence manipulation and delay effort to stall that development.

20 The task force will include current officials working in the agency’s Bureau of Competition  
21 in order to “enhance the Bureau’s focus on technology-related sectors of the economy, including  
22 markets in which online platforms compete.” It will also include 17 staff attorneys who will be  
23 tasked with investigating anti-competitive behavior in the tech industry.

24 “The role of technology in the economy and in our lives grows more important every day,”  
25 FTC Chairman Joe Simons said. “As I’ve noted in the past, it makes sense for us to closely examine  
26 technology markets to ensure consumers benefit from free and fair competition.”

27 “Technology markets ... raise distinct challenges for antitrust enforcement”

28 The new task force comes amid growing pressure for antitrust action against large tech  
companies like Facebook and Google. Earlier this month, it was reported that FTC officials have

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1 been looking to levy a multi billion-dollar fine on Facebook for repeatedly violating a privacy  
2 agreement the two bodies came to back in 2011. A coalition of advocacy groups argued that a fine  
3 would not be enough to incentivize Facebook to be more cautious with consumer data and asked the  
4 FTC to force the company spin-offs, Instagram and WhatsApp, back into their own entities once  
5 again. The groups argued that Facebook was too big for it to adequately care for user data for all  
6 three major apps.

7 Discussion over retroactive merger reviews that may result in companies divesting  
8 previously approved assets has been heating up over the last few months. The Democratic-led  
9 House Judiciary Committee has been reportedly beefing up its antitrust arm and hiring on big names  
10 like Lina Khan in the academic sphere.

11 “Technology markets, which are rapidly evolving and touch so many other sectors of the  
12 economy, raise distinct challenges for antitrust enforcement,” said Bureau Director Bruce Hoffman.  
13 “By centralizing our expertise and attention, the new task force will be able to focus on these  
14 markets exclusively – ensuring they are operating pursuant to the antitrust laws, and taking action  
15 where they are not.”

16 Hoffman confirmed that the task force would look into consummated mergers, but could not  
17 name any investigations specifically. When it comes to remedies for problematic mergers, Hoffman  
18 said that firms could be “broken out,” or could be forced to “spin off” previous acquisitions as new  
19 competitors in order to recreate the markets pre-merger.

20 Hoffman said that the task force would be working closely with the FTC’s Consumer  
21 Protection Bureau as it relates to consumer privacy enforcement especially in cases in which these  
22 issues coalesce.

23 “Our ongoing Hearings on Competition and Consumer Protection in the 21st Century are a  
24 crucial step to deepen our understanding of these markets and potential competitive issues. The  
25 Technology Task Force is the next step in that effort,” Simons said in the press release.

26 The Justice Department, which also has antitrust jurisdiction, is aware of the FTC’s new task  
27 force, according to Hoffman, and both agencies will continue to work separately on this front.

28 An alliance of investigators, forensics experts, EU prosecution offices, FBI specialists,

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1 journalists, voters and public crowd-sourced volunteers have been campaigning for the arrest,  
2 prosecution, exposure and termination of each and every company, group and individual who  
3 engaged in these crimes and reprisal attacks on those who reported them.

4 See Also: [https://www.usnews.com/news/world/articles/2019-02-27/billionaire-list-shows-](https://www.usnews.com/news/world/articles/2019-02-27/billionaire-list-shows-1t-hit-from-18-market-meltdown)  
5 [1t-hit-from-18-market-meltdown](https://www.usnews.com/news/world/articles/2019-02-27/billionaire-list-shows-1t-hit-from-18-market-meltdown)

6 The biggest problem with the FTC being effective is that the Silicon Valley Mafia have  
7 bribed many FTC officials and placed Silicon Valley lawyers inside the FTC as staff members. On  
8 top of that, over 42 Senators have taken over 120 different kinds of bribes from Silicon Valley and  
9 those Senators influence the FTC to “hold off on any major actions”.

10 In other words, over 50% of the FTC is controlled by the entities they are supposed to  
11 investigate!!!! The fox is running the hen house!

**EXHIBIT 8 - Plaintiffs Demands Details And Explanations**

**THE VICTIMS HEREIN DEMAND:**

**HUMAN RIGHTS AND CONSTITUTIONAL RIGHTS DAMAGES PAYMENTS AND  
REINSTATEMENT OF BLOCKADED RIGHTS!**

**PUNITIVE DAMAGES**

**FULL BENEFITS PAYMENTS FROM 2007 FORWARD BASED ON EARNED BENEFIT  
RIGHTS FROM 60 HOURS PER WEEK WORK FOR NATIONAL AND COMMUNITY  
PROJECTS FOR MANY DECADES AND TIMELY FILED DISABLING CONDITIONS  
CLAIMS THAT WERE BLOCKADED IN REPRISAL FOR WHISTLE-BLOWING**

**WITNESS FEES**

**INFORMANT FEES**

**WHISTLE-BLOWER FEES**

**COMPENSATORY FEES**

**LOSS OF INCOME COMPENSATION INCLUDING BUSINESS INCOME FROM  
SECURITIES INTERESTS**

**THIS IS ALSO A DEMAND FOR STATE SPONSORED LEGAL COUNSEL AND  
FINANCIAL SERVICES SUPPORT AND/OR FOR DOJ TO TAKE ON THIS CASE AND  
REPRESENT Plaintiffs INCLUDING COVERAGE AND COMPENSATION FOR CAUSES OF  
ACTION INCLUDING: ABUSE OF PROCESS; FTCA VIOLATIONS; ACCOUNT STATED;  
BREACH OF CONTRACT; CONVERSION; DEFAMATION; FRAUDULENT  
MISREPRESENTATION; FRAUDULENT CONCEALMENT; INJURIOUS FALSEHOOD,  
PRODUCT DISPARAGEMENT AND TRADE LIBEL; CIVIL RIGHTS VIOLATIONS AND  
VIOLATIONS OF THE U.S. CONSTITUTION; MISAPPROPRIATION OF TRADE**



**SECRETS; PRIMA FACIE TORT; QUANTUM MERUIT; TORTIOUS INTERFERENCE INCLUDING a.) Tortious interference with an existing contract, b.) Tortious interference with prospective, c.) Tortious interference with business relations contractual relations; PATENT INFRINGEMENT; PERSONAL INJURY; UNJUST ENRICHMENT; ANTI-TRUST LAW VIOLATIONS; LABOR LAW VIOLATIONS AND OTHER CAUSES.**

**Plaintiffs demand in dollar amount is equal to THREE HOURS OF INCOME of DEFENDANTS.**

"...WE DEMAND PAYMENT FROM The U.S. Government AND THE STATE OF CALIFORNIA FOR OUR DAMAGES, FEES, BACK-PAY AND STATE-CAUSED LOSSES FROM THIS POLITICAL CORRUPTION AND THE RELATED COVER-UP. IF WE DON'T GET OUR MONEY SOON, THE STREISAND EFFECT, THE FEDERAL INVESTIGATIONS, THE DOCUMENTARIES, THE RELEASE OF THE 'INSURANCE POLICY' AND PUBLIC FORENSICS WILL TOTALLY DESTROY EVERY SINGLE POLITICIAN AND TECH OLIGARCH THAT OPERATED THESE CRIMES! THESE ASSHOLES PROBABLY SHOULDN'T HAVE PUT HIT JOBS ON PEOPLE WHO HAVE FRIENDS IN THE CIA, NSA, FBI AND THE 'OTHER' WHITE HOUSE..."

The Victims were specifically and illegally excluded from participation in funding, benefits, jobs and income by major political figures, including U.S. Senators and White House executives who they knew, and those politician's corrupt Silicon Valley oligarch financiers. The tech Cartel and politicians attacked the victims because they would not cooperate with the crooked: sex trafficking, tax evasion, off-shore money laundering, political bribery quid-pro-quo, revolving door payola scams, foreign nation-sponsored domestic manipulations, stock market rigging, internet censorship and search engine manipulation and other crimes. They attacked the victims because they reported the crimes to federal police. They attacked the victims because their products obsoleted the products the Senators owned the stock of (ie: Tesla, Google, Facebook, Netflix are covertly owned by California politicians). They attacked the victims using taxpayer-funded state resources. That is a felony violation of the law. The ongoing cover-up of these crimes and attacks is also a felony violation of the law. The victims are owed damages compensation, witness fees and

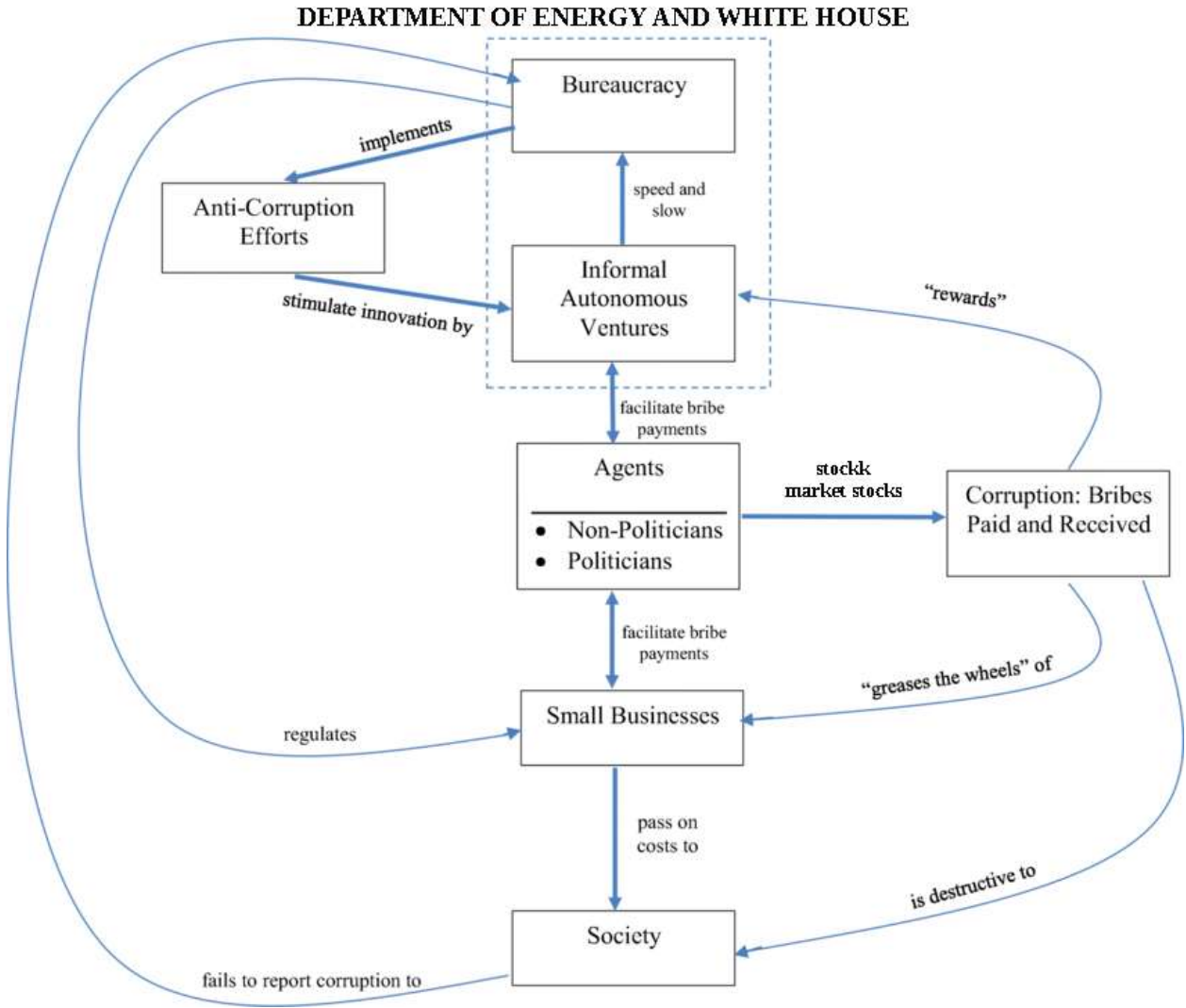
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1 back-pay.

2  
3 Federal investigators have proven (via records-tracking, financial data, surveillance, insider tips,  
4 leaks, etc.) that White House executives, government agency executives (SSA, LSC, GOVT,  
5 USPTO, etc.) and California political bosses, including California U.S. Senators, owned interests in  
6 the victims competitors worth many billions of dollars. Any citizen can confirm these assertions via  
7 public records and the evidence in this report. Those government officials ordered, financed and  
8 executed whistle-blower reprisals and anti-trust violating attacks on the victims using state-  
9 sponsored, taxpayer-funded resources. Using government resources, they engaged in the illegal  
10 reprisal attacks on the victims, as listed in the claim section entitled: "*The Specific Attacks And*  
11 *Harms Undertaken Against Plaintiffs*". The government officials manipulated SSA, HHS, GOVT,  
12 USPTO, DOJ, and other agency, payments, funds, benefits and rights in order to harm and  
13 economically damage the victims. They produced and financed a massive media defamation  
14 campaign using their Paypal Mafia-based "Silicon Valley Cartel". This 'Cartel': 1.) finances the  
15 political campaigns of the Senators and the other politicians that own stock in their Silicon Valley  
16 dirty tech companies, 2.) is the competitor of the victims, 3.) shared staff with the named politicians,  
17 4.) is the nearly exclusive beneficiary of policy actions by those politicians, and 5.) has a massive  
18 number of conflict-of-interest relationships with each of the charged politicians. The victims  
19 reported the attackers crimes to the FBI, DOJ, IG and other officials and got attacked for reporting  
20 the crimes, for busting up the organized crime effort and for running companies whose product  
21 technologies obsoleted those of the tech Cartel. The victims are claiming their rights to their  
22 damages and fee compensation, but those same public figures have blocked them from an equitable  
23 jury trial to address the matter.

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## EXHIBIT 9 - The Retaliation Attacks

### The Hired Attack Services And Hit-Job Contracting Parties:

When you enter these names in any major law enforcement or intelligence agency database forensic comparative-connection analysis software (ie XKEYSCORE), you find that they all narrow back to the same organized political crime network. The attackers hired, paid, commanded and controlled the attack services: Gawker Media, Gizmodo Media, Google, YouTube, Media Matters, Black Box, Fusion GPS, Black Cube, PsyOps, Shareblue, and other brands and used them to operate retaliation attacks against Plaintiffs and to manipulate government agency procedures against Plaintiffs in revenge/reprisal procedures.

#### Officials Manipulated Social Security Money To Retaliate Against Whistle-Blowers

Nancy Pelosi and her staff, Dianne Feinstein and her staff, Barack Obama and his staff, former CIA boss Robert James "Jim" Woolsey Jr and his staff; and over 100 other public officials, have the spy agency-type tools, resources, will and past experience to manipulate any HUD or Social Security decision against any citizen that they place on a '*black-list*' or '*hit-list*' in reprisal for competing with them or whistle-blowing on them. Per the evidence below:

Social Security, SSI, SDI, Disability and other earned benefits were stone-walled.

Applications for benefits for the Plaintiffs were intentionally "lost" like a "Lois Lerner hard drive". Files in the application process "disappeared". A U.S. Senator ordered Plaintiffs benefits to "never be approved" even though Plaintiffs worked 60 hour+ weeks for decades in service to their nation and their community. A SSA official in the local SSA office, who had a devout expressed hatred against one United States President ordered a benefits blockade against Plaintiffs because he found out that Plaintiffs ex-lawyer now worked in the White House. Forensic evidence and backgrounders on every person who worked on, or had access to, Applicants files, records, benefits decisions and related data sets shows that a number of those employees and contractors were members, financiers, web promoters or supporters of ANTIFA anarchy groups or KKK or Proud Boys related political activist-type

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1 groups. In San Francisco and Marin Counties SSA offices, in employees workspaces and on  
2 their Facebook and MySpace sites, many employees proudly display pictures of themselves  
3 wearing their pink "pussy hats", black riot gear and sporting political tattoos. FBI records  
4 and IG investigations show that SSA has the highest percentage of political activist  
5 employees of any federal agency. Such persons are inclined to become drunk with power  
6 when allowed access to the trillions of dollars of government technology on the SSA file and  
7 decisions systems. A number of these persons have worked for, or with, U.S. Senators and  
8 other politicians who targeted Applicant in political reprisal. At least 3 persons in the San  
9 Francisco SSA office, at least 2 persons in the San Mateo SSA office and at least 2 persons  
10 in Marin SSA office are known to have engaged in such actions. Applicants funding and  
11 benefits were manipulated, so as to harm Applicant, as political reprisal as vendetta for his  
12 provision of testimony to federal investigators in a trillion dollar political corruption matter  
13 involving famous political figures featured in global news coverage. A vast number of  
14 agency abuse cases and lawsuits are now on public record in the Inspector General's offices  
15 and federal courts. It is an indisputable fact that some government agencies run "hit-jobs" on  
16 citizens on orders from certain corrupt politicians.

17 These actions are felony violations of the law. Federal and State Agencies including SSA,  
18 FEC, GOVT, HHS, VA, CIA, HUD, SA, SEC, FBI, DOJ and many others, have been  
19 charged, and found guilty, in these crimes against citizens. In the Congressional  
20 investigation published by the United States Congress in review of the U.S. Department of  
21 Energy LGP/ATVM programs, it is clearly proven that the U.S. Department of Energy was  
22 used as a slush-fund by some GOVT executives in order to pay off campaign financiers by  
23 attacking and sabotaging their competitors. The GOVT Paducah Gaseous Diffusion Plant  
24 under contracts with The U.S. Government and the government-owned U.S. Enrichment  
25 Corp paid \$5M whistle-blower awards to those whistle-blowers who were attacked, using  
26 government agency resources, for reporting a crime. Dept. of Energy Hanford URS has  
27 agreed to settle a lawsuit brought by former employee Walter Tamosaitis for \$4.1 million.  
28 The settlement in the whistle-blower case comes almost one year before the case was set for

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1 a jury trial in federal court in Richland and compensates Tamosaitis for attacks against him,  
2 by GOVT officials, in retribution for reporting a crime. VA officials attacked hundreds of  
3 citizens who reported corruption, ie:

4 [https://www.thenewamerican.com/usnews/health-care/item/18610-va-whistleblowers-](https://www.thenewamerican.com/usnews/health-care/item/18610-va-whistleblowers-facing-retribution)  
5 [facing-retribution](https://www.thenewamerican.com/usnews/health-care/item/18610-va-whistleblowers-facing-retribution). As shown in this report: [https://www.pogo.org/analysis/2018/08/new-](https://www.pogo.org/analysis/2018/08/new-report-confirms-whistleblower-retaliation-is-alive-and-well-at-department-of-veterans-affairs/)  
6 [report-confirms-whistleblower-retaliation-is-alive-and-well-at-department-of-veterans-](https://www.pogo.org/analysis/2018/08/new-report-confirms-whistleblower-retaliation-is-alive-and-well-at-department-of-veterans-affairs/)  
7 [affairs/](https://www.pogo.org/analysis/2018/08/new-report-confirms-whistleblower-retaliation-is-alive-and-well-at-department-of-veterans-affairs/), Agencies attack often and harshly. CIA and NSA executives have been widely  
8 shown to use spy tools to attack domestic citizens they don't like, ie:  
9 [https://www.dailymail.co.uk/news/article-2435011/NSA-employees-used-phone-tapping-](https://www.dailymail.co.uk/news/article-2435011/NSA-employees-used-phone-tapping-tools-spy-girlfriends-cheating-husbands.html)  
10 [tools-spy-girlfriends-cheating-husbands.html](https://www.dailymail.co.uk/news/article-2435011/NSA-employees-used-phone-tapping-tools-spy-girlfriends-cheating-husbands.html) , and hundreds of other news links that can be  
11 provided. Elon Musk and Tesla, as well as Eric Schmidt and Larry Page at Google, have  
12 been proven to use the CIA group: IN-Q-TEL, to run government sponsored/financed  
13 attacks on business competitors. In Civil Action No. 1:13-cv-00777-RBW GOVERNMENT  
14 AGENCIES WERE CAUGHT BEING USED FOR ATTACKS AGAINST CITIZENS  
15 AND PUNISHED IN THE COURT AND THE MEDIA! The IRS, and hordes of other  
16 government agencies have been caught and proven, IN COURT, to target and attack people  
17 for presumed political differences.

18 Why should we assume that the Social Security Administration is not ALSO doing this too  
19 to harm citizens who speak out? The Lois Lerner IRS attacks took many years to resolve. In  
20 an unprecedented victorious conclusion to a four year-long legal battle against the IRS, the  
21 bureaucratic agency admitted in federal court that it wrongfully targeted citizens, during the  
22 Obama Administration, because of their political viewpoints and issued an apology to those  
23 people for doing so. In addition, the IRS is consenting to a court order that would prohibit it  
24 from ever engaging in this form of unconstitutional discrimination in the future. In a  
25 proposed Consent Order filed with the Court, the IRS has apologized for its treatment of  
26 U.S. citizens including organizations from 20 states that applied for 501(c)(3) and (c)(4) tax-  
27 exempt status with the IRS between 2009 and 2012 -- during the tax-exempt determinations  
28 process. Crucially, following years of denial by the IRS and blame-shifting by IRS officials,

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1 the agency now expressly admits that its treatment of our clients was wrong and a total  
2 violation of our Democracy. As set forth in the proposed Order: “The IRS admits that its  
3 treatment of Plaintiffs during the tax-exempt determinations process, including screening  
4 their applications based on their names or policy positions, subjecting those applications to  
5 heightened scrutiny and inordinate delays, and demanding of some Plaintiffs’ information  
6 that TIGTA determined was unnecessary to the agency’s determination of their tax-exempt  
7 status, was wrong.

8 For such treatment, the IRS expresses its sincere apology.” Throughout litigation of this  
9 case, activists have remained committed to protecting the rights of the public who faced  
10 unlawful and discriminatory action by the IRS and other agencies. The objective from the  
11 very beginning has been to hold agencies accountable for corrupt practices.

12 This Consent Order represents a historic victory for the public and sends the unequivocal  
13 message that a government agency’s targeting of citizens organizations, or any organization,  
14 on the basis of political viewpoints, will never be tolerated and that revenge will be swift  
15 and vast. The Order will put an end, once and for all, to the abhorrent practices utilized  
16 against citizens, as the agreement includes the IRS’s express acknowledgment of – and  
17 apology for – its wrongful treatment of the public. While this agreement is designed to  
18 prevent any such practices from occurring again, rest assured that all public interest lawyers  
19 will remain vigilant to ensure that the IRS, SSA, DOJ or SEC does not resort to such tactics  
20 in the future. Per detailed reports, in March of 2012 lawyers began being contacted by  
21 literally dozens of citizens and groups who were being harassed by the Obama IRS after  
22 submitting applications for tax-exempt status. Their tax-exempt applications were held up  
23 for years (over seven years in some cases), and they began receiving obtrusive and  
24 unconstitutional requests for donor and member information. That began a now more than  
25 five and a half year fight with the burgeoning bureaucracy at the IRS. Then on May 10,  
26 2013, Lois Lerner, the then head of the IRS Tax Exempt Organizations Division, publicly  
27 implicated the IRS in one of the worst political targeting scandals of the century.  
28



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1 This is an extraordinary victory against government agency abuse. It sends a powerful  
2 warning to the deep state bureaucracy that it will not be allowed to violate the Constitution  
3 in order to silence and shut down the whistle-blowers. In addition to the IRS's admissions of  
4 and apology for its wrongful conduct, the Consent Order would specifically award Plaintiffs  
5 the following: - A declaration by the Court that it is wrong to apply the United States tax  
6 code to any tax-exempt applicant or entity based solely on such entity's name, any lawful  
7 positions it espouses on any issues, or its associations or perceived associations with a  
8 particular political movement, position or viewpoint; - A declaration by the Court that any  
9 action or inaction taken by the IRS must be applied evenhandedly and not based solely on a  
10 tax-exempt applicant or entity's name, political viewpoint, or associations or perceived  
11 associations with a particular political movement, position or viewpoint; and - A declaration  
12 by the Court that discrimination on the basis of political viewpoint in administering the  
13 United States tax code violates fundamental First Amendment rights.

14 Disparate treatment of taxpayers based solely on the taxpayers' names, any lawful positions  
15 the taxpayers espouse on any issues, or the taxpayers' associations or perceived associations  
16 with a particular political movement, position or viewpoint is unlawful. In the Order, the  
17 IRS has also agreed that (unless expressly required by law) certain actions against the  
18 Plaintiffs— i.e. the sharing, dissemination, or other use of information unnecessarily obtained  
19 by the IRS during the determinations process (such as donor names, the names of  
20 volunteers, political affiliations of an organization's officers, etc.) – would be unlawful. In  
21 addition, the IRS promises not to take any retaliatory action against our clients for exposing  
22 the targeting scheme. Finally, and of crucial significance, the IRS admits it targeted persons  
23 and groups based on their viewpoints (i.e., "policy positions") and that such viewpoint  
24 discrimination violates fundamental First Amendment rights. This is the first time the IRS  
25 has admitted that its targeting scheme was not just "inappropriate" – as TIGTA found – but,  
26 as alleged, blatantly unconstitutional.

27  
28 To ensure consistency and uniformity within the agency's operations going forward, the IRS

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1 is required, pursuant to the Order, to inform all employees within the Exempt Organizations  
2 Division, as well as the Commissioners and Deputy Commissioners within other divisions,  
3 of the Order's terms. This Order not only validates allegations about their treatment at the  
4 hands of the corrupt Obama-era IRS but also provides important assurances to the American  
5 public that the agency understands its obligation to refrain from further such discriminatory  
6 conduct. As Attorney General Sessions acknowledged in this regard, "[t]here is no excuse  
7 for [the IRS's] conduct," as it is "without question" that the First Amendment prohibits the  
8 conduct that occurred here, i.e., subjecting American citizens to disparate treatment "based  
9 solely on their viewpoint or ideology." Sessions further confirmed his Department's  
10 commitment to ensuring that the "abuse of power" in which the IRS engaged here "will not  
11 be tolerated." It is impossible to overstate the importance of this victory.

12 This marks a years-long fight for justice in defense of the constitutional rights of the public.  
13 This is an extraordinary victory against abuse of power and corruption. It sends a powerful  
14 warning to the deep state bureaucracy that it will not be allowed to violate the Constitution  
15 and manipulate the IRS, SSA and other agencies in order to silence and shut down those  
16 who speak out about political corruption crimes. In the wake of Wisconsin Watchdog's  
17 investigation into SSA staff allegations of incompetence, misconduct, and retaliation in  
18 Social Security disability appeals offices, several employees have taken their complaints to a  
19 Senate committee led by Wisconsin Sen. Ron Johnson.

20  
21 An official with knowledge of the complaints said the Senate Homeland Security and  
22 Governmental Affairs Committee, chaired by the Oshkosh Republican, has received emails  
23 and other contacts from "certain people" inside the Social Security Administration's Office  
24 of Disability Adjudication and Review. The initial complaints came from an employee  
25 inside the Milwaukee office following Wisconsin Watchdog's opening investigative report  
26 that found some claimants waiting more than 1,000 days for an appeals decision on their  
27 disability benefits claim. Following Wednesday's story of a whistle-blower in the Madison  
28 ODAR office, the committee has received more specific complaints about retaliation against

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employees, the source said. Committee staff members sent the latest Watchdog piece to SSA administrators hoping they will “cooperate,” the source said. To date, the agency has been less than cooperative. “This is an ongoing process, and they are not always as forthcoming as we’d like them to be,” the source said. “Hopefully with your continued reporting, this is an issue they can’t duck.” A Senate committee member said officials there are working with the Office of Special Counsel on “multiple whistle-blower retaliation claims.” The committee continues to request information from the SSA. The whistle-blower in the Madison office claims management retaliated against her after she was called to testify in a misconduct case.

The incident involved “inappropriate behavior” by an administrative law judge, she said. “They are so corrupt. It’s absolutely horrible,” said the woman, a lead case technician in the Madison Office of Disability Adjudication and Review. She spoke on condition of anonymity, fearing more retribution from her supervisors. While she said recounting her particular experiences will more than likely betray her identity anyway, the ODAR case worker insisted she has had enough. “I’m at point where they don’t care about me, I don’t see why I’m protecting them. This is my last resort,” she said. “I want to do my work without fear of retaliation.” She said she has contacted the Senate committee. “I forwarded my information to them and I got an email back from them. See these reports:

- [WSJ: 131 Federal Judges Broke Law by Hearing Cases Where They Had Financial Interest...](#)

[\*Dirty profits from bench...\*](#)

<https://www.wsj.com/articles/hidden-interest-judges-financial-conflicts-graphic-11632834079>

<https://www.wsj.com/articles/131-federal-judges-broke-the-law-by-hearing-cases-where-they-had-a-financial-interest-11632834421>

- They said people are coming out of the woodwork with their complaints (about ODAR) following your story,” the whistle-blower said. Ronald Klym, a long-time senior legal

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1 assistant in the Milwaukee ODAR office, alleges he has been retaliated against by  
2 supervisors for going public with his charges of incompetence and misconduct in the  
3 agency. The federal employee, who has worked for SSA for 16 years, provided Wisconsin  
4 Watchdog with documents showing extremely long wait times for claimants appealing their  
5 denied applications for benefits. Doug Nguyen, SSA regional spokesman, in a previous story  
6 said the agency acknowledges that Milwaukee ODAR has a “high average processing time  
7 for disability appeal hearings, and we are working to address the issue.” Beyond the delays  
8 is what Klym calls the “shell game,” the wholesale transferring of cases to other parts of the  
9 country by administrators to make the Milwaukee office’s numbers look better than they are.  
10 The Madison office whistle-blower confirmed Klym’s allegations, saying at one point she  
11 saw 2,000 cases from the Milwaukee office handed off to the Oak Brook operation. There  
12 are over 10,000 SSA disability manipulation charges against SSA executives and staff.

**EXHIBIT 10 – Court Demand For FBI ‘302 Reports’ On Each Attacker**

Demand for FBI 302 reports on the following identified attackers has been hereby submitted to the FBI. The FBI and FINCEN have been requested to interview and engage in surveillance upon these individuals who engaged with organizations who transferred funds abroad and who sought to subvert public policy. The investigation of each should include NSA recordings known to exist, for each, from 2005 to date. Conclusions from those 302 interviews and investigations should be directed to accurately answering investigation parameters including:

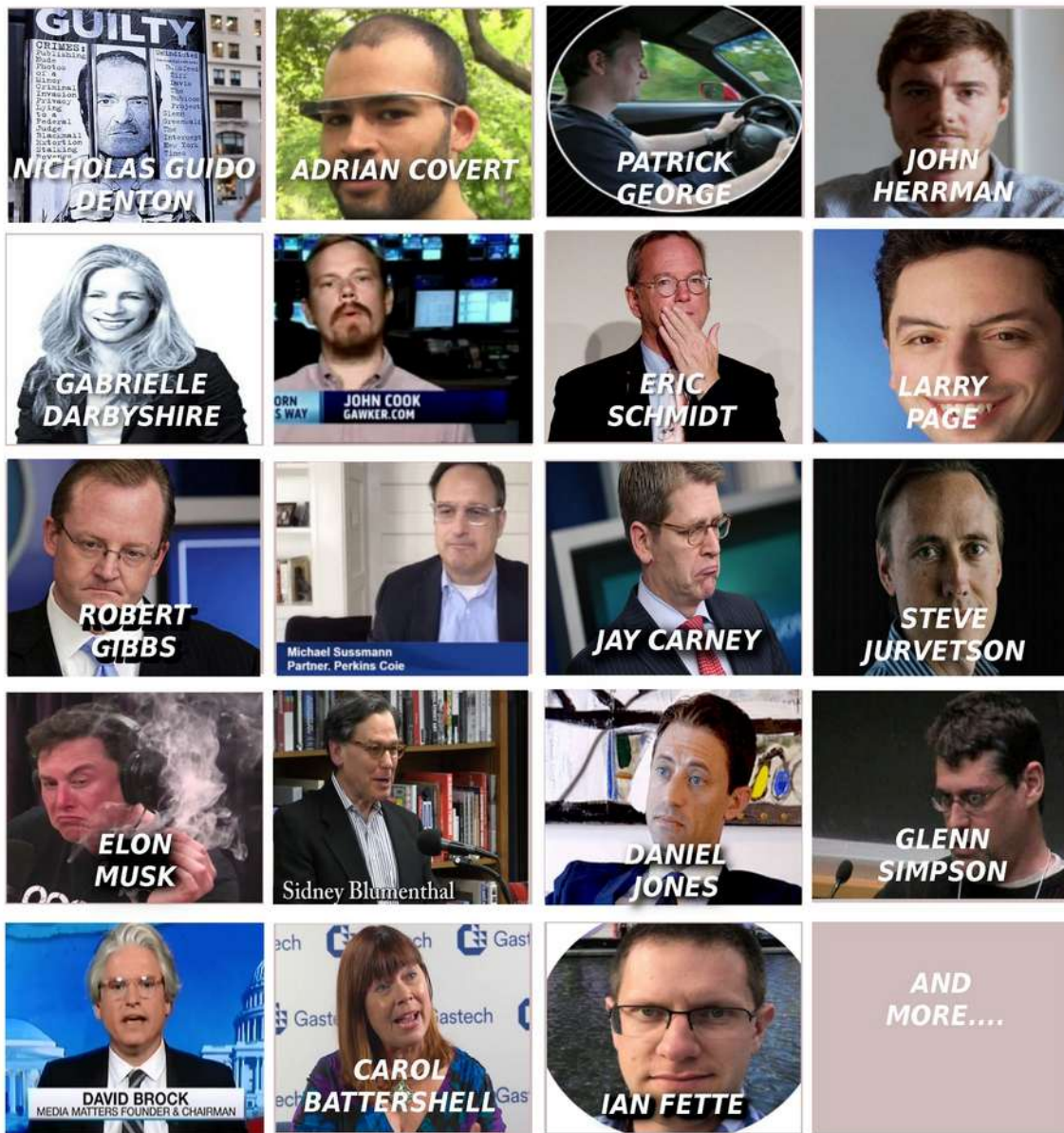
1. Who had command and control of the attackers actions against Plaintiffs?
2. How were the attackers compensated?
3. How did each attacker first hear of the existence of Plaintiffs?
4. Identify each party who edited, reviewed, or consulted with the work product of each attacker?
5. What was the quid pro quo with clicks, advertising exposure, blog postings and web metrics?
6. Did any attacker pose as a third party to write their own blog comments under an assumed name? Which postings?
7. Who paid for the animated attack video production and which studio edited and sound produced the content?
8. Produce each email communication that went to, from or CC to any party at Google, Youtube, Alphabet or their subsidiaries? Submissions will be cross-referenced with NSA archives.
10. Provide all attackers, and their families, banking, bitcoin, Paypal, credit card and tax records from 2005 to date.
11. In addition to orders from your superiors, when did you first, otherwise, hear of Plaintiffs?
12. Why did you avoid ever giving Plaintiffs a chance to review, comment on or correct any material prior to publication?
13. Why did your release of the attack media only occur via your outlets, and via no other outlet on Earth, at exactly the same time?
14. In Presidential elections, how much money, and other compensation, did your office pay, or receive, in order to operate these same kinds of attacks against an opposition candidate?

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**THE ATTACKERS. REPORTED TO FBI, DOJ AND POLICE**



**THE VICTIM'S HAVE DEDICATED ALL AVAILABLE RESOURCES TO PLACING THEM UNDER SURVEILLANCE AND LAW ENFORCEMENT MONITORING FOR THE REST OF THEIR LIVES. EVERY ILLICIT SEX, DRUG, TAX, REAL ESTATE, POLITICAL FINANCE AND OTHER ACT IS DOCUMENTED AND REPORTED. THE TARGETS ALL SHARE FINANCIAL BENEFITS, COMMUNICATIONS, COMMAND/CONTROL, MOTIVATION, OPPORTUNITY, UNJUST REWARDS AND OTHER TRACKING METRICS.**

**EXHIBIT 11 - These Are The Hired Attackers**



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1 The Courts and Congressional hearings have proven that White House, U.S. Senators and  
2 their ex-CIA and Ex-FBI operatives have been proven to have used SSA and other government  
3 agencies, over and over again, to harm witnesses, reporters and whistle-blowers in illegal retribution  
4 attacks. Applicant's own Senators have been caught doing this over and over in order to protect  
5 their stock market ownership in Tesla Motors, see:

6 [http://focus-book.com/public/THE\\_ELON\\_MUSK\\_STORY.m4v](http://focus-book.com/public/THE_ELON_MUSK_STORY.m4v)

7 [http://newsplus007.com/public/THE\\_ELON\\_MUSK\\_STORY.m4v](http://newsplus007.com/public/THE_ELON_MUSK_STORY.m4v)

8 ... available on many streaming video sites.

9 Some government agencies have avoided any and all responsive replies to the Applicant, or  
10 his advocates, due to the political and media embarrassment involved for some of their staff. That  
11 non-responsive, generic reply, stone-walling effort can no longer be tolerated.

12 Since 2008 when Applicant raised these issues, over 100 government staff have been fired,  
13 the FBI Director and Attorney General involved in this case were fired, 60 Minutes and hundreds of  
14 other newscasts have covered this issue and there is no end in sight of investigations against  
15 government officials who engaged in reprisal and vendettas against Applicant simply because he  
16 did the right thin and assisted Congress and the FBI. Numerous books and films about this matter  
17 are now distributed globally. It is not rational for government officials to allow this matter to fester.

18 This natural-born American citizen ( *Witness2021B* ) was attacked with a \$30 million  
19 dollar+ retribution/political-reprisal/revenge hatchet-job program. The cost of the attack is proven  
20 by bank records, payments and comparative analysis of hit-jobs run by political candidates against  
21 each other.

22 The "hit-job" was contracted by White House and Department of Energy political  
23 operatives, their appointees and staffing. Those public officials illegally used taxpayer-financed  
24 government funds. They were also business competitors the witness.. They are mad because they  
25 got caught doing crimes with taxpayer funds and the witness assisted with their interdiction.  
26 Thousands of similar attacks, on other citizens, have now been widely covered in major news  
27 stories and court cases. It is now impossible to deny that such attacks exist on a regular basis.  
28 Reprisal attacks are SOP in DC!

1 The victim and his associates made legal history by helping the government sue itself for  
2 corruption. Their energy investment group won their federal lawsuit case proving that: **public**  
3 **agencies infected with corruption manipulate policy against those who report corruption**  
4 **and/or their competitors.**

5 Since that case, many other cases have been won by other victims who proved the same  
6 assertion. There is, now, no legal or historical-fact question about the veracity of the proof that  
7 public officials put "hit-jobs" on reporters, whistle-blowers or competitors using government  
8 resources to do so. In fact, today, the U.S. Congress is spending nearly a third of it's time on the  
9 question of agencies being used as reprisal operations.

10 A large number of well-known public officials were removed from their government  
11 positions because of their illicit deeds, exposed in these cases. Plaintiffs/Applicant's files were  
12 hacked by government-paid hackers. In particular, the employees and contractors of United States  
13 senators and White House executives hired these hackers via layered contracting routes.

14 Additionally, Federal prosecutors in Manhattan determined that FBI employees — three  
15 analysts and an agent — were able to view citizens private material because it was entered in  
16 Silicon Valley's Palantir software through the program's default settings. "When data is loaded onto  
17 the Platform, the default setting is to permit access to the data to other FBI personnel otherwise  
18 authorized to access the Platform," prosecutors wrote in a published court letter. It has been  
19 discovered that many Palantir staff can look at those records and re-sell that data to Google, Tesla  
20 or any third party. Plaintiffs records have been seen in the easy-to-interdict Palantir system.

21 In our communication with agencies, some of those agencies provided links to their entire  
22 server files which exposed the names, addresses, phone numbers, poverty status, emails and other  
23 records of their clients. They also exposed direct server access for hackers to easily exploit. We  
24 have informed each agency and they have now deleted the materials but other agency systems are  
25 known to be at risk and we do not have the resources to address them all.

26 Whereas, numerous Congressional reports, IT staff reports and security industry reports  
27 have verified that agency servers and files, including those upon which Plaintiffs records were  
28 housed, have been hacked, moved, deleted and edited by outside third parties including Chinese and

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1 Russian hackers, bored teens and hired opposition research operatives and that the hardware level  
2 back-doors for SPECTRE and many other incursion sets still exist in agency Cisco, Intel, Juniper  
3 Networks and other Network devices now connected to government file networks at GOVT, SSA,  
4 FEC, and other agencies and this fact is indisputable. At the very least, China, Russian or Brazilian  
5 teen hackers have them up for sale on the Dark Web. The NSA certainly has copies of them.

6 Further: [https://arstechnica.com/information-technology/2021/07/an-explosive-spyware-](https://arstechnica.com/information-technology/2021/07/an-explosive-spyware-report-shows-limits-of-ios-android-security/)  
7 [report-shows-limits-of-ios-android-security/](https://arstechnica.com/information-technology/2021/07/an-explosive-spyware-report-shows-limits-of-ios-android-security/)

8 FOR THE RECORD:

9 Per the FBI, DOJ, FCC and Congressional investigators:

10 It is widely verified by the U.S. DOJ that hackers such as Wang Dong, Sun Kailiang, Wen  
11 Xinyu, Huang Zhenyu, and Gu Chunhui, who were officers in Unit 61398 of the Third Department  
12 of the Chinese People's Liberation Army (PLA) and Aleksei Sergeyevich Morenets, 41, Evgenii  
13 Mikhaylovich, Serebriakov, 37, Ivan Sergeyevich Yermakov, 32, Artem Andreyevich Malyshev,  
14 30, and Dmitriy Sergeyevich Badin, 27, who were each assigned to Military Unit 26165, and Oleg  
15 Mikhaylovich Sotnikov, 46, and Alexey Valerevich Minin, 46, who were also GRU officers, and  
16 hackers-for-hire including Kevin David Mitnick, Adrian Lamo, Albert Gonzalez, Matthew Bevan,  
17 Richard Pryce, Jeanson James Ancheta, Michael Calce, Kevin Poulsen, Jonathan James, The hacker  
18 known as ASTRA, The hacker known as GUCIFER, The hacker known as ANON 4CHAN and  
19 THOUSANDS of other individuals had free access and free reign throughout NSA, FBI, SSA, HUD,  
20 DOJ, OPM, CIA and other government servers via the SPECTRE, EMOTET, PRIME ROOTKIT,  
21 SERCOMM BACKDOOR, NOTPETYA, MELTDOWN, MASTERKEY, RYZENFALL,  
22 FALLOUT, CHIMERA, and hundreds of other back doors and penetration vulnerabilities in Cisco,  
23 Intel, Juniper Networks, AMD, and other equipment. Additionally, all of the core server penetration  
24 tools used by the CIA and the NSA were hacked by foreign nations and their core source code  
25 posted on the internet for all to use. On July 27, 2021 this was disclosed:

26 [https://news.sky.com/story/irans-secret-cyber-files-on-how-cargo-ships-and-petrol-stations-could-](https://news.sky.com/story/irans-secret-cyber-files-on-how-cargo-ships-and-petrol-stations-could-be-attacked-12364871)  
27 [be-attacked-12364871](https://news.sky.com/story/irans-secret-cyber-files-on-how-cargo-ships-and-petrol-stations-could-be-attacked-12364871)

28 It is ludicrous for any agency to state that any government servers, prior to 2020, were not

1 widely penetrated and manipulated. The hackers are all known to have sold, or provided the results  
2 of their work to famous politicians for use against their competitors.

3 Nancy Pelosi is an owner of the hacking manipulation firm: CROWDSTRIKE. Crowdstrike  
4 and famous California Senators had the easy means, the motivations, the staffing, the resources and  
5 the known engagement of services to manipulate SSA, DOJ, SEC, FTC and other agency decisions  
6 and filing records in order to harm Plaintiffs, reporters and whistle-blowers who reported their  
7 crimes and corruptions.

8 Reports such as:

9 [http://www.opensecrets.org/personal-finances/nancy-pelosi/net-worth?](http://www.opensecrets.org/personal-finances/nancy-pelosi/net-worth?cid=N00007360&year=2011)  
10 [cid=N00007360&year=2011](http://www.opensecrets.org/personal-finances/nancy-pelosi/net-worth?cid=N00007360&year=2011)

11 and

12 [https://www.realclearinvestigations.com/articles/2020/10/09/](https://www.realclearinvestigations.com/articles/2020/10/09/pelosi_takes_big_stake_in_crowdstrike_democrat-tied_linchpin_of_russiagate_125557.html)  
13 [pelosi takes big stake in crowdstrike democrat-tied linchpin of russiagate 125557.html](https://www.realclearinvestigations.com/articles/2020/10/09/pelosi_takes_big_stake_in_crowdstrike_democrat-tied_linchpin_of_russiagate_125557.html)

14 ...prove that, for example, Nancy Pelosi owns digital attack services.

15 Reports such as:

16 [https://www.msn.com/en-us/news/politics/feinstein-s-former-staffer-helped-funnel-](https://www.msn.com/en-us/news/politics/feinstein-s-former-staffer-helped-funnel-millions-to-steele-and-fusion-gps-after-2016/ar-BB1gBzxQ)  
17 [millions-to-steele-and-fusion-gps-after-2016/ar-BB1gBzxQ](https://www.msn.com/en-us/news/politics/feinstein-s-former-staffer-helped-funnel-millions-to-steele-and-fusion-gps-after-2016/ar-BB1gBzxQ)

18 and

19 <https://dailycaller.com/2019/11/07/feinstein-fusion-gps-steele/>

20 ... and thousands of other reports prove that Dianne Feinstein's staff regularly hire hit-job  
21 services. Those services have been proven by the FBI, DOJ and JSOC to regularly hire hackers.

22 The hackers, daily, use the common tools of:

23 A. Injection. Injection flaws, such as SQL, NoSQL, OS, and LDAP injection, occur when  
24 untrusted data is sent to an interpreter as part of a command or query. The attacker's hostile data can  
25 trick the interpreter into executing unintended commands or accessing data without proper  
26 authorization.

27 B. Broken Authentication. Application functions related to authentication and session  
28 management are often implemented incorrectly, allowing attackers to compromise passwords, keys,

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1 or session tokens, or to exploit other implementation flaws to assume other users' identities  
2 temporarily or permanently.

3 C. Sensitive Data exposure. Many web applications and APIs do not properly protect  
4 sensitive data, such as financial, healthcare, and PII. Attackers may steal or modify such weakly  
5 protected data to conduct credit card fraud, identity theft, or other crimes. Sensitive data may be  
6 compromised without extra protection, such as encryption at rest or in transit, and requires special  
7 precautions when exchanged with the browser.

8 D. XML External Entities (XXE). Many older or poorly configured XML processors  
9 evaluate external entity references within XML documents. External entities can be used to disclose  
10 internal files using the file URI handler, internal file shares, internal port scanning, remote code  
11 execution, and denial of service attacks.

12 E. Broken Access Control. Restrictions on what authenticated users are allowed to do are  
13 often not properly enforced. Attackers can exploit these flaws to access unauthorized functionality  
14 and/or data, such as access other users' accounts, view sensitive files, modify other users' data,  
15 change access rights, etc.

16 F. Security Misconfiguration. Security misconfiguration is the most commonly seen issue.  
17 This is commonly a result of insecure default configurations, incomplete or ad hoc configurations,  
18 open cloud storage, misconfigured HTTP headers, and verbose error messages containing sensitive  
19 information. Not only must all operating systems, frameworks, libraries, and applications be  
20 securely configured, but they must be patched/upgraded in a timely fashion.

21 G. Cross-Site Scripting XSS. XSS flaws occur whenever an application includes untrusted  
22 data in a new web page without proper validation or escaping, or updates an existing web page with  
23 user-supplied data using a browser API that can create HTML or JavaScript. XSS allows attackers  
24 to execute scripts in the victim's browser which can hijack user sessions, deface web sites, or  
25 redirect the user to malicious sites.

26 H. Insecure Deserialization. Insecure deserialization often leads to remote code execution.  
27 Even if deserialization flaws do not result in remote code execution, they can be used to perform  
28 attacks, including replay attacks, injection attacks, and privilege escalation attacks.

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1 I. Using Components with Known Vulnerabilities. Components, such as libraries,  
2 frameworks, and other software modules, run with the same privileges as the application. If a  
3 vulnerable component is exploited, such an attack can facilitate serious data loss or server takeover.  
4 Applications and APIs using components with known vulnerabilities may undermine application  
5 defenses and enable various attacks and impacts.

6 J. Insufficient Logging & Monitoring. Insufficient logging and monitoring, coupled with  
7 missing or ineffective integration with incident response, allows attackers to further attack systems,  
8 maintain persistence, pivot to more systems, and tamper, extract, or destroy data. Most breach  
9 studies show time to detect a breach is over 200 days, typically detected by external parties rather  
10 than internal processes or monitoring.

11 We have provided reports, evidence and time to investigate and assist in interviews to the  
12 FBI, GAO, SEC and other Congressional and agency assets. The investigations have found that  
13 famous senators, their Silicon Valley oligarch financiers and their associates run a felony-class  
14 organized crime insider-trading scam that abuses taxpayers and sabotages competing businesses at  
15 the expense of the public treasuries.

16 ***Imagine living in a world where almost every one of the public officials that were***  
17 ***supposed to help you turned out to be your business competitors. Imagine having them use***  
18 ***government resources to profit at your expense, blockade you and treat democracy like a garage***  
19 ***sale!***

20 This is about a group of U.S. Senators, Silicon Valley Oligarchs, Crooked Law Firms and  
21 Lobbyists who commit crimes in order to manipulate over a trillion tax dollars into their, and their  
22 friends pockets. They use media monopoly tricks to try to shut out any other viewpoints. They push  
23 manufactured "emotional trigger" issues that they believe will get more tax money allocated to  
24 "issue solutions" that they, and their friends, happen to already own the monopolies for. They are  
25 felons yet they control some of the offices of the agencies who are supposed to arrest them. Silicon  
26 Valley bought K Street lobby firms and U.S. Senators, gave them more 'Dark Money' than history  
27 has ever seen and then had giant tech-law firms bribe, hit-job and blockade any attempts to arrest  
28 them.

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1 The U.S. Government hired victim, paid him part of the offered money, then asked him to  
2 spend his life savings and years of his time on THEIR federal project based on their lies and false-  
3 promises.

4 He was defrauded by the government assertions!

5 Then the government took the assets victim were asked to invest, plus the money they owed  
6 him, and gave it to their friends. When he and his associates complained to the FBI, Congress and  
7 the SEC, they hired Fusion GPS-like companies to run "hit-jobs" on him and threaten his life.

8 The Victim was lied to and defrauded by government agencies.

9 Government officials took the money they had promised him and gave it to their friends,  
10 who are competitors to the victim.

11 The government used him, and his peers, as a smoke-screen to hide their crony payola crime  
12 that put taxpayer cash in their crony friend's pockets.

13 Victim has received ZERO justice and ZERO compensation for his damages, his time, his  
14 witness testimony and his help provided to the authorities!

15 The Victim **demands** recompense **money from the State And Federal authorities!**

16 **One Of Their Attack Procedures - Documented**

17 Here is just one of the ways Google and the DNC's Nick Denton attack tabloids (Gawker,  
18 Gizmodo, Jalopnik, etc.) partnered to attack whistle-blowers under orders from Senators Boxer,  
19 Pelosi Feinstein, Reid, Harris and others.

20 ROBERT EPSTEIN hereby verifies the following:

21 Authorities in the UK have finally figured out that fake news stories and Russian-placed ads  
22 are not the real problem. The UK Parliament is about to impose stiff penalties—not on the people  
23 who place the ads or write the stories, but on the Big Tech platforms that determine which ads and  
24 stories people actually see.

25 Parliament's plans will almost surely be energized by the latest leak of damning material  
26 from inside Google's fortress of secrecy: The Wall Street Journal recently reported on emails  
27 exchanged among Google employees in January 2017 in which they strategized about how to alter  
28 Google search results and other "ephemeral experiences" to counter President Donald Trump's



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1 newly imposed travel ban. The company claims that none of these plans was ever implemented, but  
2 who knows?

3 While U.S. authorities have merely held hearings, EU authorities have taken dramatic steps  
4 in recent years to limit the powers of Big Tech, most recently with a comprehensive law that  
5 protects user privacy—the General Data Protection Regulation—and a whopping \$5.1 billion fine  
6 against Google for monopolistic practices in the mobile device market. Last year, the European  
7 Union also levied a \$2.7 billion fine against Google for filtering and ordering search results in a  
8 way that favored their own products and services. That filtering and ordering, it turns out, is of  
9 crucial importance.

10 As years of research I’ve been conducting on online influence has shown, content per se is  
11 not the real threat these days; what really matters is (a) which content is selected for users to see,  
12 and (b) the way that content is ordered in search results, search suggestions, news feeds, message  
13 feeds, comment lists, and so on. That’s where the power lies to shift opinions, purchases, and votes,  
14 and that power is held by a disturbingly small group of people.

15 I say “these days” because the explosive growth of a handful of massive platforms on the  
16 internet—the largest, by far, being Google and the next largest being Facebook—has changed  
17 everything. Millions of people and organizations are constantly trying to get their content in front of  
18 our eyes, but for more than 2.5 billion people around the world—soon to be more than 4 billion—  
19 the responsibility for what algorithms do should always lie with the people who wrote the  
20 algorithms and the companies that deployed them.

21 In randomized, controlled, peer-reviewed research I’ve conducted with thousands of people,  
22 I’ve shown repeatedly that when people are undecided, I can shift their opinions on just about any  
23 topic just by changing how I filter and order the information I show them. I’ve also shown that  
24 when, in multiple searches, I show people more and more information that favors one candidate, I  
25 can shift opinions even farther. Even more disturbing, I can do these things in ways that are  
26 completely invisible to people and in ways that don’t leave paper trails for authorities to trace.

27 Worse still, these new forms of influence often rely on ephemeral content—information that  
28 is generated on the fly by an algorithm and then disappears forever, which means that it would be

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1 difficult, if not impossible, for authorities to reconstruct. If, on Election Day this coming November,  
2 Mark Zuckerberg decides to broadcast go-out-and-vote reminders mainly to members of one  
3 political party, how would we be able to detect such a manipulation? If we can't detect it, how  
4 would we be able to reduce its impact? And how, days or weeks later, would we be able to turn  
5 back the clock to see what happened?

6 Of course, companies like Google and Facebook emphatically reject the idea that their  
7 search and newsfeed algorithms are being tweaked in ways that could meddle in elections. Doing so  
8 would undermine the public's trust in their companies, spokespeople have said. They insist that  
9 their algorithms are complicated, constantly changing, and subject to the "organic" activity of users.

10 This is, of course, sheer nonsense. Google can adjust its algorithms to favor any candidate it  
11 chooses no matter what the activity of users might be, just as easily as I do in my experiments. As  
12 legal scholar Frank Pasquale noted in his recent book "The Black Box Society," blaming algorithms  
13 just doesn't cut it; the responsibility for what an algorithm does should always lie with the people  
14 who wrote the algorithm and the companies that deployed the algorithm. Alan Murray, president of  
15 Fortune, recently framed the issue this way: "Rule one in the Age of AI: Humans remain  
16 accountable for decisions, even when made by machines."

17 Given that 95 percent of donations from Silicon Valley generally go to Democrats, it's hard  
18 to imagine that the algorithms of companies like Facebook and Google don't favor their favorite  
19 candidates. A newly leaked video of a 2016 meeting at Google shows without doubt that high-  
20 ranking Google executives share a strong political preference, which could easily be expressed in  
21 algorithms. The favoritism might be deliberately programmed or occur simply because of  
22 unconscious bias. Either way, votes and opinions shift.

23 It's also hard to imagine how, in any election in the world, with or without intention on the  
24 part of company employees, Google search results would fail to tilt toward one candidate. Google's  
25 search algorithm certainly has no equal-time rule built into it; we wouldn't want it to! We want it to  
26 tell us what's best, and the algorithm will indeed always favor one dog food over another, one  
27 music service over another, and one political candidate over another. When the latter happens ...  
28 votes and opinions shift.

1 Here are 10 ways—seven of which I am actively studying and quantifying—that Big Tech  
2 companies could use to shift millions of votes this coming November with no one the wiser. Let’s  
3 hope, of course, that these methods are not being used and will never be used, but let’s be realistic  
4 too; there’s generally no limit to what people will do when money and power are on the line.

### 5 **1. Search Engine Manipulation Effect (SEME)**

6 Ongoing research I began in January 2013 has shown repeatedly that when one candidate is  
7 favored over another in search results, voting preferences among undecided voters shift  
8 dramatically—by 20 percent or more overall, and by up to 80 percent in some demographic groups.  
9 This is partly because people place inordinate trust in algorithmically generated output, thinking,  
10 mistakenly, that algorithms are inherently objective and impartial.

11 But my research also suggests that we are conditioned to believe in high-ranking search  
12 results in much the same way that rats are conditioned to press levers in Skinner boxes. Because  
13 most searches are for simple facts (“When was Donald Trump born?”), and because correct answers  
14 to simple questions inevitably turn up in the first position, we are taught, day after day, that the  
15 higher a search result appears in the list, the more true it must be. When we finally search for  
16 information to help us make a tough decision (“Who’s better for the economy, Trump or Clinton?”),  
17 we tend to believe the information on the web pages to which high-ranking search results link.

18 As The Washington Post reported last year, in 2016, I led a team that developed a system for  
19 monitoring the election-related search results Google, Bing, and Yahoo were showing users in the  
20 months leading up to the presidential election, and I found pro-Clinton bias in all 10 search  
21 positions on the first page of Google’s search results. Google responded, as usual, that it has “never  
22 re-ranked search results on any topic (including elections) to manipulate political sentiment”—but I  
23 never claimed it did. I found what I found, namely that Google’s search results favored Hillary  
24 Clinton; “re-ranking”—an obtuse term Google seems to have invented to confuse people—is  
25 irrelevant.

26 Because (a) many elections are very close, (b) 90 percent of online searches in most  
27 countries are conducted on just one search engine (Google), and (c) internet penetration is high in  
28 most countries these days—higher in many countries than it is in the United States—it is possible

1 that the outcomes of upwards of 25 percent of the world's national elections are now being  
2 determined by Google's search algorithm, even without deliberate manipulation on the part of  
3 company employees. Because, as I noted earlier, Google's search algorithm is not constrained by  
4 equal-time rules, it almost certainly ends up favoring one candidate over another in most political  
5 races, and that shifts opinions and votes.

## 6 **2. Search Suggestion Effect (SSE)**

7 When Google first introduced autocomplete search suggestions—those short lists you see  
8 when you start to type an item into the Google search bar—it was supposedly meant to save you  
9 some time. Whatever the original rationale, those suggestions soon turned into a powerful means of  
10 manipulation that Google appears to use aggressively.

11 My recent research suggests that (a) Google starts to manipulate your opinions from the very  
12 first character you type, and (b) by fiddling with the suggestions it shows you, Google can turn a  
13 50–50 split among undecided voters into a 90–10 split with no one knowing. I call this manipulation  
14 the Search Suggestion Effect (SSE), and it is one of the most powerful behavioral manipulations I  
15 have ever seen in my nearly 40 years as a behavioral scientist.

16 How will you know whether Google is messing with your election-related search  
17 suggestions in the weeks leading up to the election? You won't.

## 18 **3. The Targeted Messaging Effect (TME)**

19 If, on Nov. 8, 2016, Mr. Zuckerberg had sent go-out-and-vote reminders just to supporters of  
20 Mrs. Clinton, that would likely have given her an additional 450,000 votes. I've extrapolated that  
21 number from Facebook's own published data.

22 Because Zuckerberg was overconfident in 2016, I don't believe he sent those messages, but  
23 he is surely not overconfident this time around. In fact, it's possible that, at this very moment,  
24 Facebook and other companies are sending out targeted register-to-vote reminders, as well as  
25 targeted go-out-and-vote reminders in primary races. Targeted go-out-and-vote reminders might  
26 also favor one party on Election Day in November.

27 My associates and I are building systems to monitor such things, but because no systems are  
28 currently in place, there is no sure way to tell whether Twitter, Google, and Facebook (or

Facebook’s influential offshoot, Instagram) are currently tilting their messaging. No law or regulation specifically forbids the practice, and it would be an easy and economical way to serve company needs. Campaign donations cost money, after all, but tilting your messaging to favor one candidate is free.

#### **4. Opinion Matching Effect (OME)**

In March 2016, and continuing for more than seven months until Election Day, Tinder’s tens of millions of users could not only swipe to find sex partners, they could also swipe to find out whether they should vote for Trump or Clinton. The website iSideWith.com—founded and run by “two friends” with no obvious qualifications—claims to have helped more than 49 million people match their opinions to the right candidate. Both CNN and USA Today have run similar services, currently inactive.

I am still studying and quantifying this type of, um, helpful service, but so far it looks like (a) opinion matching services tend to attract undecided voters—precisely the kinds of voters who are most vulnerable to manipulation, and (b) they can easily produce opinion shifts of 30 percent or more without people’s awareness.

At this writing, iSideWith is already helping people decide who they should vote for in the 2018 New York U.S. Senate race, the 2018 New York gubernatorial race, the 2018 race for New York District 10 of the U.S. House of Representatives, and, believe it or not, the 2020 presidential race. Keep your eyes open for other matching services as they turn up, and ask yourself this: Who wrote those algorithms, and how can we know whether they are biased toward one candidate or party?

#### **5. Answer Bot Effect (ABE)**

More and more these days, people don’t want lists of thousands of search results, they just want the answer, which is being supplied by personal assistants like Google Home devices, the Google Assistant on Android devices, Amazon’s Alexa, Apple’s Siri, and Google’s featured snippets—those answer boxes at the top of Google search results. I call the opinion shift produced by such mechanisms the Answer Bot Effect (ABE).

My research on Google’s answer boxes shows three things so far: First, they reduce the time

1 people spend searching for more information. Second, they reduce the number of times people click  
2 on search results. And third, they appear to shift opinions 10 to 30 percent more than search results  
3 alone do. I don't yet know exactly how many votes can be shifted by answer bots, but in a national  
4 election in the United States, the number might be in the low millions.

## 5 **6. Shadowbanning**

6 Recently, Trump complained that Twitter was preventing conservatives from reaching many  
7 of their followers on that platform through shadowbanning, the practice of quietly hiding a user's  
8 posts without the user knowing. The validity of Trump's specific accusation is arguable, but the fact  
9 remains that any platform on which people have followers or friends can be rigged in a way to  
10 suppress the views and influence of certain individuals without people knowing the suppression is  
11 taking place. Unfortunately, without aggressive monitoring systems in place, it's hard to know for  
12 sure when or even whether shadowbanning is occurring.

## 13 **7. Programmed Virality and the Digital Bandwagon Effect**

14 Big Tech companies would like us to believe that virality on platforms like YouTube or  
15 Instagram is a profoundly mysterious phenomenon, even while acknowledging that their platforms  
16 are populated by tens of millions of fake accounts that might affect virality.

17 In fact, there is an obvious situation in which virality is not mysterious at all, and that is  
18 when the tech companies themselves decide to shift high volumes of traffic in ways that suit their  
19 needs. And aren't they always doing this? Because Facebook's algorithms are secret, if an executive  
20 decided to bestow instant Instagram stardom on a pro-Elizabeth Warren college student, we would  
21 have no way of knowing that this was a deliberate act and no way of countering it.

22 The same can be said of the virality of YouTube videos and Twitter campaigns; they are  
23 inherently competitive—except when company employees or executives decide otherwise. Google  
24 has an especially powerful and subtle way of creating instant virality using a technique I've dubbed  
25 the Digital Bandwagon Effect. Because the popularity of websites drives them higher in search  
26 results, and because high-ranking search results increase the popularity of websites (SEME),  
27 Google has the ability to engineer a sudden explosion of interest in a candidate or cause with no one  
28 —perhaps even people at the companies themselves—having the slightest idea they've done so. In

2015, I published a mathematical model showing how neatly this can work.

## **8. The Facebook Effect**

Because Facebook's ineptness and dishonesty have squeezed it into a digital doghouse from which it might never emerge, it gets its own precinct on my list.

In 2016, I published an article detailing five ways that Facebook could shift millions of votes without people knowing: biasing its trending box, biasing its center newsfeed, encouraging people to look for election-related material in its search bar (which it did that year!), sending out targeted register-to-vote reminders, and sending out targeted go-out-and-vote reminders.

I wrote that article before the news stories broke about Facebook's improper sharing of user data with multiple researchers and companies, not to mention the stories about how the company permitted fake news stories to proliferate on its platform during the critical days just before the November election—problems the company is now trying hard to mitigate. With the revelations mounting, on July 26, 2018, Facebook suffered the largest one-day drop in stock value of any company in history, and now it's facing a shareholder lawsuit and multiple fines and investigations in both the United States and the EU.

Facebook desperately needs new direction, which is why I recently called for Zuckerberg's resignation. The company, in my view, could benefit from the new perspectives that often come with new leadership.

## **9. Censorship**

I am cheating here by labeling one category "censorship," because censorship—the selective and biased suppression of information—can be perpetrated in so many different ways.

Shadow-banning could be considered a type of censorship, for example, and in 2016, a Facebook whistle-blower claimed he had been on a company team that was systematically removing conservative news stories from Facebook's news-feed. Now, because of Facebook's carelessness with user data, the company is openly taking pride in rapidly shutting down accounts that appear to be Russia-connected—even though company representatives sometimes acknowledge that they "don't have all the facts."

Meanwhile, Zuckerberg has crowed about his magnanimity in preserving the accounts of



1 people who deny the Holocaust, never mentioning the fact that provocative content propels traffic  
2 that might make him richer. How would you know whether Facebook was selectively suppressing  
3 material that favored one candidate or political party? You wouldn't. (For a detailed look at nine  
4 ways Google censors content, see my essay "The New Censorship," published in 2016.)

### 5 **10. The Digital Customization Effect (DCE)**

6 Any marketer can tell you how important it is to know your customer. Now, think about that  
7 simple idea in a world in which Google has likely collected the equivalent of millions of Word  
8 pages of information about you. If you randomly display a banner ad on a web page, out of 10,000  
9 people, only five are likely to click on it; that's the CTR—the "click-through rate" (0.05 percent).  
10 But if you target your ad, displaying it only to people whose interests it matches, you can boost your  
11 CTR a hundredfold.

12 That's why Google, Facebook, and others have become increasingly obsessed with  
13 customizing the information they show you: They want you to be happily and mindlessly clicking  
14 away on the content they show you.

15 In the research I conduct, my impact is always larger when I am able to customize  
16 information to suit people's backgrounds. Because I know very little about the participants in my  
17 experiments, however, I am able to do so in only feeble ways, but the tech giants know everything  
18 about you—even things you don't know about yourself. This tells me that the effect sizes I find in  
19 my experiments are probably too low. The impact that companies like Google are having on our  
20 lives is quite possibly much larger than I think it is. Perhaps that GOVT doesn't scare you, but it  
21 sure scares me.

### 22 **The Same Direction**

23 OK, you say, so much for Epstein's list! What about those other shenanigans we've heard  
24 about: voter fraud (Trump's explanation for why he lost the popular vote), gerrymandering, rigged  
25 voting machines, targeted ads placed by Cambridge Analytica, votes cast over the internet, or, as I  
26 mentioned earlier, those millions of bots designed to shift opinions. What about hackers like Andrés  
27 Sepúlveda, who spent nearly a decade using computer technology to rig elections in Latin America?  
28 What about all the ways new technologies make dirty tricks easier in elections? And what about

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1 those darn Russians, anyway?

2 To all that I say: kid stuff. Dirty tricks have been around since the first election was held  
3 millennia ago. But unlike the new manipulative tools controlled by Google and Facebook, the old  
4 tricks are competitive—it's your hacker versus my hacker, your bots versus my bots, your fake  
5 news stories versus my fake news stories—and sometimes illegal, which is why Sepúlveda's efforts  
6 failed many times and why Cambridge Analytica is dust.

7 "Cyberwar," a new book by political scientist Kathleen Hall Jamieson, reminds us that  
8 targeted ads and fake news stories can indeed shift votes, but the numbers are necessarily small. It's  
9 hard to overwhelm your competitor when he or she can play the same games you are playing.

10 Now, take a look at my numbered list. The techniques I've described can shift millions of  
11 votes without people's awareness, and because they are controlled by the platforms themselves,  
12 they are entirely noncompetitive. If Google or Facebook or Twitter wants to shift votes, there is no  
13 way to counteract their manipulations. In fact, at this writing, there is not even a credible way of  
14 detecting those manipulations.

15 And what if the tech giants are all leaning in the same political direction? What if the  
16 combined weight of their subtle and untraceable manipulative power favors one political party? If  
17 150 million people vote this November in the United States, with 20 percent still undecided at this  
18 writing (that's 30 million people), I estimate that the combined weight of Big Tech manipulations  
19 could easily shift upwards of 12 million votes without anyone knowing. That's enough votes to  
20 determine the outcomes of hundreds of close local, state, and congressional races throughout the  
21 country, which makes the free-and-fair election little more than an illusion.

22 Full disclosure: I happen to think that the political party currently in favor in Silicon Valley  
23 is, by a hair (so to speak), the superior party at the moment. But I also love America and democracy,  
24 and I believe that the free-and-fair election is the bedrock of our political system. I don't care how  
25 "right" these companies might be; lofty ends do not justify shady means, especially when those  
26 means are difficult to see and not well understood by either authorities or the public.

27 Can new regulations or laws save us from the extraordinary powers of manipulation the Big  
28 Tech companies now possess? Maybe, but our leaders seem to be especially regulation-shy these

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1 days, and I doubt, in any case, whether laws and regulations will ever be able to keep up with the  
2 new kinds of threats that new technologies will almost certainly pose in coming years.

3 I don't believe we are completely helpless, however. I think that one way to turn Facebook,  
4 Google, and the innovative technology companies that will succeed them, into responsible citizens  
5 is to set unsophisticated monitoring systems that detect, analyze, and archive what they're showing  
6 people—in effect, to fight technology with technology.

7 As I mentioned earlier, in 2016, I led a team that monitored search results on multiple search  
8 engines. That was a start, but we can do much better. These days, I'm working with business  
9 associates and academic colleagues on three continents to scale up systems to monitor a wide range  
10 of information the Big Tech companies are sharing with their users—even the spoken answers  
11 provided by personal assistants. Ultimately, a worldwide ecology of passive monitoring systems  
12 will make these companies accountable to the public, with information bias and online manipulation  
13 detectable in real time.

14 With November drawing near, there is obviously some urgency here. At this writing, it's not  
15 clear whether we will be fully operational in time to monitor the midterm elections, but we're  
16 determined to be ready for 2020.

17 - Robert Epstein is a senior research psychologist at the American Institute for Behavioral  
18 Research and Technology in California.

19 The members of the Silicon Valley Cartel, and the Senators that they own, created the  
20 above-listed tactics and deploy them against their comptitors and whistle-blowers, in violation of  
21 human rights and civil rights laws.

22 The preps manually set-up these digital attack processes. They are not “glitches” or  
23 “bugs”.

24 All of the above tactics have been documented being used by Google, Facebook,  
25 YouTube and LinkedIn, against victim, as reprisal, on orders from U.S. Senator  
26  
27  
28

## EXHIBIT 12 - Senators Are Your Attackers And Your Business Competitors

When the White House puts a [hit-job](#) on you, you probably won't survive it. They, and the crooked California Senators that facilitate such payback and reprisal attacks, are really good at state-sponsored revenge tactics.

At least you will know that the crime you reported was real. You will get a bit of vindication on top of the death threats, Fusion GPS bots, Black Cube trolls, and Nick Denton character assassination screeds.

You will know for sure that the political mobster-thing you whistle-blew on was about to take down ***The President of the United States*** if it got traction in the news. The "main-stream" Silicon Valley corporation-controlled propaganda news is hard to get around. A multi-trillion dollar embezzlement of public funds could have done it, though.

The government asked the victims to invest their life savings, years of their lives, their health, their brands and their friends money in a federal project. The victims agreed and that got them inside the darkest corridors of Washington, DC. What they saw there shocked them and unraveled an epic crime that affects every citizen in America!

This book documents the crime, the corruption, the reprisals and the state of modern Democracy...

---

Federal investigators have proven (via records-tracking, financial data, surveillance, insider tips, leaks, etc.) that White House executives, government agency executives (SSA, LSC, GOVT, USPTO, etc.) and California political bosses, including California U.S. Senators, owned interests in the victims competitors worth many billions of dollars. Any citizen can confirm these assertions via public records and the evidence in this report.

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1 The FBI has been arresting major political figures in this organized crime ring in San Francisco City  
2 Hall. Those government officials ordered, financed and executed whistle-blower reprisals and anti-  
3 trust violating attacks on the victims using state-sponsored, taxpayer-funded resources. Using  
4 government resources, they engaged in the illegal reprisal attacks on the victims. Those harms are  
5 listed in detail in the claim section of the filed Victim Demand entitled: "*The Specific Attacks And*  
6 *Harms Undertaken Against Plaintiffs*".  
7

8 Corrupt government officials manipulated SSA, HHS, GOVT, USPTO, DOJ, and other agency,  
9 payments, funds, benefits and rights in order to harm and economically damage the victims. They  
10 produced and financed a massive media defamation campaign using their Paypal Mafia-based  
11 "Silicon Valley Cartel". This 'Cartel': **1.)** finances the political campaigns of the Senators and the  
12 other politicians that own stock in their Silicon Valley dirty tech companies, **2.)** is the competitor of  
13 the victims, **3.)** shared staff with the named politicians, **4.)** is the nearly exclusive beneficiary of  
14 policy actions by those politicians, and **5.)** has a massive number of conflict-of-interest relationships  
15 with each of the charged politicians.  
16  
17

18 The victims reported the attackers crimes to the FBI, DOJ, IG and other officials and got attacked  
19 for reporting the crimes, for busting up the organized crime effort and for running companies whose  
20 product technologies obsoleted those of the tech Cartel. The victims are claiming their rights to their  
21 damages and fee compensation, but those same public figures have blocked them from an equitable  
22 jury trial to address the matter.  
23  
24

25 The government has provided the attacker/political campaign financiers/competitors of the victims  
26 with tens of billions of dollars of free government cash yet the victims have gotten nothing but grief  
27 from the public officials who are supposed to help them because a criminal cover-up is in process.  
28

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1  
2 The politicians who got those “bad guys” that free taxpayer-provided money, own the stock of those  
3 criminal’s companies, are best friends with those oligarchs and are politically financed by those  
4 corrupt players. This organized crime cartel operates the most audacious and corrupt scheme in  
5 American political history.

6  
7  
8 This legal demand is based on first-hand damages, experience, interviews and discussions, with  
9 hundreds of government employees and contractors; well-known politicians and their support  
10 teams; plus tech CEO’s and their employees. It is also based on FBI records, GAO reports and  
11 Congressional forensic experts.

12  
13 This material has been filed with the FBI, DOJ, FTC, OSC, SEC, SSA, FCC, IG Offices, U.S.  
14 Congress and other relevant agencies as please to help the victims of these crimes. This is not just  
15 an informational document, it is a demand for justice! Some of the victims have been providing  
16 evidence to the DOJ and FBI, in this organized crime investigation, since 1978.

17  
18  
19 ***Not only do the Department of Energy, The Inspector General’s office and all of the left-over***  
20 ***staffers from the Obama Administration refuse to take any action; they actively operate a cover-***  
21 ***up and expend vast amounts of taxpayer dollars to operate this cover-up and to engage in “hit-***  
22 ***jobs”, reprisals and revenge tactics against the victims to punish them for whistle-blowing. They***  
23 ***do this to hide billions of dollars of dirty stock market profits they engage in to this day. They do***  
24 ***this to hide quid pro quo revolving door felony corruption schemes they engage in to this day.***  
25 ***They do this to hide their felony crimes that they profit from, via unjust rewards, to this day.***  
26  
27  
28

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1 Additionally, some of the material in this demand was provided to the authors by those agencies.

2 While some of this material is politically embarrassing to some of those agencies, all parties  
3 acknowledge that this disclosure assists in improved transparency at those agencies.

4  
5 **In every government agency there are three types of workers: 1.) The “good ones”, 2.) the**  
6 **“evil ones” and 3.) the “worker bees”. No matter how many “evil ones” there are at a given**  
7 **agency or department, it only takes ten “good ones” to bust them and get them fired or**  
8 **arrested. The “worker bee” ones tend to support the “good ones” in order to avoid disruption.**  
9 **This report could not have existed without the help of a few of the Elliot Ness-type “good**  
10 **ones” from each agency.**

11  
12  
13 The dictionary defines an **Omerta** ( *ō-mûr'tə, ō'mĕr-tă'* ) as: ► n., A rule or code that  
14 prohibits speaking or divulging information about certain activities, especially the activities of a  
15 criminal organization; Alternative spelling of **omertà**.( <https://www.wordnik.com/words/omertà> ); a  
16 code of silence practiced by the Mafia; a refusal to give evidence to the police about criminal  
17 activities.

18  
19  
20 This case is about an *Omerta* practiced by well-known public officials and their Silicon Valley  
21 financiers. Calling this crime, both, a “*Capitol Hill Omerta*” and a “*Capitol Hill Omerta*” are both  
22 appropriate since this involves a White House and Congress corrupted by cash.

23 Facebook, Google, Amazon, Ebay, Twitter, LinkedIn and Tesla bosses collude with politicians and  
24 conspire to run racketeering operations.

25  
26  
27 Their synchronized and coordinated manipulation of news and media always has only one  
28 profiteering intention and always uses tactics which steer the manipulation effects to the benefit of



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1 the tech Cartel. The tech Cartel bosses are all exclusive recipients of government cash, jobs,  
2 contracts and other payola provided to them as quid pro quo. Their scam is operated for the  
3 oligarchs by: 1.) technology law firms, 2.) CPA corporations, 3.) “bundlers” and 4.) lobbyists that  
4 run the whole corrupt process for these crooks. ***These four groups, more than any other parties***  
5 ***MUST be FBI raided, outlawed and shut down by Congressional action! They are the biggest***  
6 ***mobsters in the whole scheme!***

7  
8  
9 These crooks interact, every moment, with billions of average people around the world without  
10 oversight. There is no effective Congressional or public monitoring of these oligarchs. No other  
11 companies in the world are allowed the same access to government and the same exemption from  
12 the law. Their access and position is based on taxpayer financed resources which only *they* are  
13 allowed to use because of their bribe payments to famous politicians. In other words: ***You, the***  
14 ***public, paid for the government resources and perks they use to operate their abusive monopolies.***

15  
16  
17 They have used their monopolistic, extremist, synchronized access to control public and  
18 government impressions, policies, elections, social moods and perceptions for their ideological and  
19 profiteering goals. Bribes in the form of cash, stock, advertising, revolving door jobs, sex workers,  
20 real estate, and hundreds of other kinds of payola, have been paid to *most* of the U.S. Congress and  
21 regulatory agency staff.

22  
23  
24 They meet covertly in restaurant and bar back-rooms (ie: “The AngelGate Scandal”), hotel suites,  
25 Aspen resorts and private mansions in order to plot and scheme their coordinated efforts. They  
26 control significant numbers of executives at the FBI, GOVT, FTC, DOT, SEC and other agencies,  
27 who, under non-compromised conditions, would normally arrest or indict them. They have an  
28

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1 extraordinary number of ex-CIA, ex-IN-Q-TEL and ex-Mossad spy staff employed at their  
2 companies because they enjoy the power of spy trade craft tools to manipulate business and politics.

3  
4 They tell their naive young employees one thing and use their work-efforts to accomplish another  
5 thing: Their political goals!

6  
7  
8 They use Scientology and Rajneesh cult-like '*mindfulness*' and '*holistic*' echo-chambering to  
9 exploit their employees.

10  
11 They have staged a nearly one trillion dollar government funds kickback operation, via the highly  
12 placed government officials they control, in a massive quid pro quo and stock market manipulation  
13 schemes.

14  
15  
16 FBI and DOJ bosses (including Comey, Holder, McCabe, etc.) were fully aware of these facts  
17 because they received written reports stating this facts as early as 2008. They covered up the crimes  
18 of the Cartel in order to protect their profiteering insider partners.

19  
20 Very few people understand how the Silicon Valley media Cartel's subliminal messaging, mood  
21 manipulation and intention triggering technologies work and how they can be used to cause  
22 physical, emotional and cultural harm on an epic scale. The mass manipulation power of the Cartel  
23 is astonishing and VERY hard for the average person to comprehend from a technological and  
24 psychological perspective. In the 2020 elections, San Francisco voters overwhelmingly approved a  
25 ballot measure to impose an extra tax on any big tech company that pays its highest-paid employee  
26 over 100 times more than its median worker. This was a direct attack on the corrupt bosses of Tesla,  
27  
28

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1 Google, Facebook, and their ilk, that our team organized.

2  
3 The ballot question was [approved](#) by voters,. As the [ballot question](#) states, the new tax is to  
4 be imposed on "businesses in San Francisco when their highest-paid managerial employee earns  
5 more than 100 times the median compensation paid to their employees in San Francisco."

6 This is because 1.) **criminal tech oligarchs** pay-off 2.) **politicians** and their 3.) **Silicon**  
7 **Valley billionaire political manipulator buddies** with a menage-et-trios bribe payola three-way  
8 scheme using money from public taxpayers and public shareholders. It is a ring of corruption that  
9 never stops spinning and the crooks are funded by public money. Eric Schmidt, Elon Musk, Larry  
10 Page, Harvey Weinstein, Jeffrey Epstein, Mark Zuckerberg, and the rest, engage in unspeakable  
11 acts using so much public money that they make Al Capone pale in comparison.  
12 This Cartel of oligarchs and politicians have "**Kill Teams**" of hired tech mercenaries and media  
13 attackers that they pay to terminate members of the public, the media and smaller business that  
14 expose them or compete with them. Those attackers are identified, by name, in this book, and their  
15 tactics are exposed herein. In the DOJ case against Google ( **Case # 1:20-cv-03010** ), it is quite clear  
16 that Google is at the tip of an organized crime empire and a conspiracy to control news and  
17 commerce.  
18  
19

20  
21 To ignore, or cover up, the facts that these companies are a Mafia-class organized crime  
22 Cartel is to subject the national population to a risk greater than that of the entire old Italian Mafia!

23 The links herein point to over 2 million pages of confirming evidence documents and over  
24 60 hours of documentary and surveillance videos already provided to, or by, government  
25 investigators. This massive volume of evidence provides indisputable proof of the assertions herein  
26 by the people who were "*in the room*" and who witnessed these crimes!  
27

28 The only reason the Google's of the world are afraid of the truth is because they cannot exist

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1 in the face of the facts! The tech Cartel's greed made them forget the old rule: *"Dirty deeds done in*  
2 *the dark will always come to light!"*

3 When you talk to a public official who is involved in these cover-ups, they will lie to you. In  
4 almost every instance, the officials we asked to solve these problems turned out to be simpering,  
5 pandering, extremist zealots who will say anything to deny, distract, defer and delay justice and  
6 interdiction in these matters. The most famous senators, mayors and White House personnel were  
7 all discovered to be putting cash in their bank accounts, getting jobs, getting sex and buying  
8 mansions from the profits of these crimes.  
9

10 In fact, NSA surveillance; DOJ surveillance; government agency mail server records;  
11 corporate mail server records; Google email records; Yahoo email records; Facebook storage  
12 records; Linkedin archive records; tattoos; personal email and texting files; social media postings;  
13 photographs of the parties of interest at protests, riots, marches and social parties; their voting  
14 records; their financial stock ownership records; statements from their co-workers; financial records  
15 of their political contributions; their contacts lists on their smartphones and MS Outlook; adjacent  
16 building video surveillance cameras; stickers and signs on their cars and homes; AI processed  
17 analytical decision trees of the rulings they have made within government agencies; their job  
18 applications records from Craigslist, Monster, Taleo, etc; and a massive amount of other FBI-  
19 quality evidence; has proven that there does not appear to be anybody who worked on the victims  
20 case who was not an extremist, socialist, pro-anarchy activist. If any agency can prove otherwise,  
21 we are delighted to see the evidence. Federal IT officials have stated that almost every person who  
22 has touched, moved, ordered, requested or reviewed the Plaintiffs files is documented and it is easy  
23 to use NSA or Palantir-type software to rapidly confirm the assertion.  
24

25  
26 taxpayer funded government resources were used to harm and damage the Plaintiffs as  
27 reprisal for their assistance to law enforcement.  
28

Thus, State and Federal agencies owe Plaintiffs funds to compensate for those harms and

1 damages.

2 Forensic investigative history has now proven that those government officials at various  
3 agencies were either financed by, friends, with, sleeping with, dating the staff of, holding stock  
4 market assets in, promised a revolving door job or government service contracts from, partying  
5 with, personal friends with, photographed at private events with, exchanging emails with, business  
6 associates of or directed by; applicant's business adversaries, or the Senators and agency politicians  
7 that those business adversaries pay campaign finances to, or supply political digital search  
8 manipulation services to.  
9

10 That was a violation of Plaintiffs State and Federal Constitutional rights, all of Plaintiffs  
11 civil rights and a violation of a vast number of laws.

12 There are thousands and thousands of news reports, Inspector General reports and staff  
13 reports about FBI officials engaging in political bias and/or retaliation using government resources.  
14 The articles, like:

15 [https://truepundit.com/welcome-to-the-worst-fbi-field-office-millions-of-dollars-wasted-as-agents-](https://truepundit.com/welcome-to-the-worst-fbi-field-office-millions-of-dollars-wasted-as-agents-get-tailed-by-other-fbi-agents-trouble-makers-get-labeled-as-terrorists/)  
16 [get-tailed-by-other-fbi-agents-trouble-makers-get-labeled-as-terrorists/](https://truepundit.com/welcome-to-the-worst-fbi-field-office-millions-of-dollars-wasted-as-agents-get-tailed-by-other-fbi-agents-trouble-makers-get-labeled-as-terrorists/)

17 and

18 [https://truepundit.com/welcome-to-the-worst-fbi-field-office-in-america-dea-calls-it-a-real-sht-](https://truepundit.com/welcome-to-the-worst-fbi-field-office-in-america-dea-calls-it-a-real-sht-show/)  
19 [show/](https://truepundit.com/welcome-to-the-worst-fbi-field-office-in-america-dea-calls-it-a-real-sht-show/)

20 AND

21 [https://www.usatoday.com/penny-nance-intel-community-targets-americans-what-i-learned-](https://www.usatoday.com/penny-nance-intel-community-targets-americans-what-i-learned-from-fbis-assessment-of-me-my-organization/)  
22 [from-fbis-assessment-of-me-my-organization/](https://www.usatoday.com/penny-nance-intel-community-targets-americans-what-i-learned-from-fbis-assessment-of-me-my-organization/)

23 AND

24 [https://theconservativetreehouse.com/blog/2021/07/20/inspector-general-outlines-more-gross-fbi-](https://theconservativetreehouse.com/blog/2021/07/20/inspector-general-outlines-more-gross-fbi-misconduct-with-senior-officials-and-media-collusion/)  
25 [misconduct-with-senior-officials-and-media-collusion/](https://theconservativetreehouse.com/blog/2021/07/20/inspector-general-outlines-more-gross-fbi-misconduct-with-senior-officials-and-media-collusion/)

26 ... are terrifying.  
27  
28

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1 Columnist [Kurt Schlichter](#) writes that with the latest revelation of massive FBI  
2 incompetence/corruption – turns out the G-men ended up not just screwing up the gymnastics  
3 pervert case but lying about it under oath – you have to wonder something. We keep getting told  
4 that the rank-and-file are A-OK, that it’s just a few bad apples up on the top floor who are framing  
5 people, botching investigations, not stopping mass killers, urging intrafamilial narcing, and busting  
6 LEGO insurrectionists. Fine, great, dandy.

7  
8 So, where are all the good apples?

9 Who quit in protest?

10 Who resigned and went public?

11 Who said “No?”

12 If I was more technically savvy, this is where I would insert a GIF of a tumbleweed blowin’  
13 across the range.

14 Your oath or your pension is the choice, and the pension seems to prevails almost every  
15 single time. Not always – here a Space Force light colonel sacrifices his command to tell the truth,  
16 there a teacher gets fired for refusing to indoctrinate his students. But it’s an anomaly, like we were  
17 told the bad apples are an anomaly. Abandon your delusion that the good apples shall soon rise up  
18 and put things right. Have you seen a tsunami of right-putting?

19 And not just at the FBI, an agency so utterly corrupted and broken that President DeSantis  
20 should fire the director, order all the agents to the streets to patrol for jaywalkers, then demolish the  
21 hideous HQ building and sow the ground beneath it with salt. No, the good apples shortage is  
22 everywhere in government, from the feds down to your local flatfoot. And its in our other  
23 institutions too.

24 Who was it who busted mommies for felony kids-not-wearing-face-thongs-while-alone-and-  
25 outside? It wasn’t that malignant gnome Fauci. It wasn’t some MSNBCNN Baghdad Bob. It was  
26 local cops who did the bidding of their masters when the bidding was obviously bullSchiff. But they  
27 did it. They did the bidding. And we can’t unsee it.

28 How about in colleges? We hear about how bad it is and how scared everyone is, and we

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1 learn that a lot of professors really, really don't like this CRT fascism stuff. But with few  
2 exceptions, they do nothing. They censor themselves, conform, and hope that somehow this will all  
3 blow over.

4 How about the media? Where are the journalist good apples there who stand up for  
5 objectivity, truth, and not being the ventriloquist dummies of the DNC? Almost all we see are bad  
6 apples, or a *pomme de terre* in the case of Brian Stelter, who is a potato.

7 The same with our military, fresh off its ignominious defeat in Afghanistan. Name me the  
8 general or admiral who quit because of this CRT idiocy. Maybe some did quietly, just running out  
9 the clock and bailing, but have they stood up and called out the Kendi clique at the Pentagon? A  
10 bunch of vets in Congress just punched out [a devastating report](#) on how broken the Navy is – the  
11 answer is “very” – and the question that comes to mind is “Where were the leaders?” The deadly  
12 nonsense that the report highlights did not just happen. It was the result of choices, including the  
13 choice not to shout “What the hell are you people thinking?”

14 Who made the choice to do that? No one. No, they made the choice to put their heads down  
15 and keep going, pretending [to remain calm because all is well](#).

16 All is not well, not remotely.

17 Many serve in silence, grumbling to the few friends that they can trust. They know this is all  
18 wrong, but they have a mortgage and besides, if all the good apples leave, who is left?

19 But does it matter that the institutions are all bad apples if the good apples never do a damn  
20 thing to stop them?

21 No. What they do is buck up the institutions that we should let collapse from the weight of  
22 their own mendacity and failure. The good apples are enablers. Bad apples need the good apples.  
23 And the good apples are good little apples, showing up for work, following orders, mentally  
24 excusing themselves from their participation in the abominations that our institutions have become.

25 I guess it's easy for me to tell some FBI guy with a kid in college assigned to bust granny  
26 tourist “insurrectionists,” or a two-star who always wanted to be a division commander and will get  
27 that gig if he just stays quiet about how the Army is turning into a bitter punchline, to do the right  
28 thing. I don't have to pay the piper; they do. But then, they took an oath. They promised to do the



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1 right thing. No one ever said the right thing is easy. No one ever *promised* that the right thing won't  
2 carry consequences. They signed up for that. And they should do it.

3 Is it easy for me to say? Yeah. does that make it false? Nope.

4 Listen, everyone who is part of an institution – FBI agents, soldiers, journalists, professors,  
5 dog catchers, and whatever the hell they call the people in the Space Force. Stop enabling the rot.  
6 You must report the corruption and incompetence you see, loudly and publicly. You must stand up  
7 and say “No.” And maybe you even need to quit.

8 But you don't get to be silently complicit and pretend you're a good apple.



**EXHIBIT 13 – Political Reprisal, Vendetta, Payback, Retribution, Retaliation, Revenge**

This is about the actual corruption, crimes and attacks a group of “Plaintiffs” experienced. This is the legacy that will follow the perpetrators throughout history. Long after the crooks documented here have passed away, the world will still know their crimes and corruption.

This material is not about political ideologies.

It is not about Democrats or Republicans.

It is about **racketeering, insider trading and organized crime.**

The victims are all natural born United States citizen(s) residing in America who worked for, and with, the State and Federal government as contractor/employees in technology, intelligence and/or law enforcement roles and had relationships with White House, Mayoral, Senate and Congressional executives (and their financiers) who provided knowledge of the stated crimes. They are not associated with any political party and self-identify as “independent” voters.

The Plaintiffs suffered harms and damages from a felony organized crime operated by County, State and Federal public officials, per forensic investigators, FBI, Congressional reports and filed federal FOIA request responses pursuant to the Freedom of Information Act (FOIA), (5 U.S.C. § 552 et seq.) and the implementing regulations of the United States government, and applicable laws. The Plaintiffs are seeking to acquire compensation for their damages and expose and curtail this type of corruption for all of time.

Via standard legal and forensic accounting metrics the damages to some of the members of the public who were harmed by this corruption can be easily calculated. The Plaintiffs in this “Omerta” corruption case are seeking an award of \$1.5 billion dollars, per the list of harms in the sections below, from the Federal Treasury to compensate them for the proven harms and damages caused to the Plaintiffs. Further, they are seeking damages and back-pay funds from the general State and Federal Treasury funds.

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For contrast, taxpayer-financed government ‘payola’ and crony conduit funds in excess of **\$18 billion (Tesla)** and **\$49 billion (Google)**, respectively, have been given to each of two of Plaintiffs competitors, who then made many times those amounts by profiteering off those funds via criminal and corrupt activities. Those two insider examples are only two of dozens of technology oligarch-operated examples in the **Cartel** that government officials profited from, but these two are prime examples of the criminal activities engaged in, and covered up, at the expense of Plaintiffs who were attacked for reporting the crimes.

Both of those entities are now under federal investigation and civil charges for racketeering and organized crime. It is shocking, to every voting citizen, that such criminal entities would receive such a massive volume of corrupt quid-pro-quo largess while law-abiding Plaintiffs technologies and products, which obsolete those competitors products on every metric, would be blockaded. Plaintiffs were attacked using state-sponsored resources, due to bribery and crimes by public officials, who own stock and benefits in those competitors.

Plaintiffs have also been blockaded from their rights to legal council and equitable legal representation because this case exposes and embarrasses famous public officials who seek a cover-up. Nonetheless, denying Plaintiffs their civil and Constitutional rights is one of the biggest forms of human rights violations in the United States of America!

In one example, and for reference, we examine the United States Department of Energy government ‘loan’ program which was a “**stimulus fund**” authorized under section 136 of the [Energy Independence and Security Act of 2007](#).

([https://en.wikipedia.org/wiki/Energy\\_Independence\\_and\\_Security\\_Act\\_of\\_2007](https://en.wikipedia.org/wiki/Energy_Independence_and_Security_Act_of_2007) )

Congress provided the program with \$25 billion in loan authority, supported by a \$7.5 billion appropriation to fund the credit subsidy. All the money cam from you, the taxpayer.

The ATVM, LGP and battery funds were designed by lobbyists to benefit corrupt politicians and their billionaire financiers and to kill off their competitors.

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Recent reports, such as:

<https://www.sfgate.com/business/article/Inside-eBay-s-Cockroach-Cult-The-Ghastly-Story-15599604.php> )

prove that tech Cartel members: Ebay, Amazon, Tesla, [Facebook](#)

( <http://popurls.com/go/pop/lbae924f6b574ffcc129f0f361e411de8> ),

Google, Netflix, et al; maintain para-military attack and surveillance geek armies, **within** their organizations, to go after competitors, whistle-blowers and those that their owners dislike.

These “**Kill Teams**” have CIA-like tools and funding to “target and destroy” any member of the public. Department of Energy officials pointed the finger at targets and paid some of these strike-force operatives via quid-pro-quo.

Many of the leaders of these political assassination teams were hired from the previous White House administration. Obama PR Director Jay Carney, who now works for Amazon, was documenting suggesting a hit on employees who spoke out about warehouse safety. Congressional leader Devin Nunes was targeted by six of these companies. The Tesla ‘Intimidation Director ‘ was documented in court records running attack vectors against Tesla employee Martin Tripp because he reported safety cover-ups

( [Watch This Pedestrian](#) <http://popurls.com/go/pop/l94e3e600c2346835275b4ca0ceac31ad> )

at the Tesla factory. The documents provided prove that [tech billionaires](#)

( <http://popurls.com/go/pop/le7bddc602d893b8ebdc36ea1357df4ad> )

hire, and partner with, White House staff to destroy the lives of American citizens who compete with, or report the crimes of those entities.

The U.S. Government worked closely with these **Kill Teams** in order to sabotage competitors of their insiders. [Explosive New FBI Texts](#)

( <https://www.allsides.com/news/2020-09-25-1011/trump-was-right-explosive-new-fbi-texts-detail-internal-furor-over-handling> )

prove that even the highest levels of law enforcement help put hit-jobs on those they disagree with!

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1 Corrupt government officials used a process, known in intelligence community trade craft circles as  
2 a "**Vendetta Cycle**", to 'kill' citizens. The process involves cutting off every outside source of  
3 income, running defamation media campaigns to forestall any future income, forcing the targets to  
4 be exclusively reliant on government funds **but** making the funds so minimal that the citizens could  
5 not afford to pay lawyers to help fight the attacks. The 'Vendetta Cycle' process blocks the targets  
6 from their money, their legal rights and their freedom. The process is repeated endlessly, and the  
7 government funds reduced, over time, until the victim is terminated.

8 This reprisal revenge process can be operated by just a handful of Senators and White House  
9 staff but the results are always lethal. It is 100% illegal and a vast violation of the United States  
10 Constitution but it is used constantly by political sociopath Senators. The process is described in  
11 leaked CIA, Russian and British spy manuals and widely covered by Glenn Greenwald and ICIJ  
12 reporters.

13 Even though the law in California (Cal. Lab. Code § § 1050 to 1053) says that an entity can't  
14 prevent or attempt to prevent former workers from getting work through misrepresentation,  
15 knowingly permit or fail to take reasonable steps to prevent blacklisting, or make a statement about  
16 why an employee was discharged or left employment, implying something other than what is  
17 explicitly said, or providing information that was not requested: **It is done every day in Silicon**  
18 **Valley.**

19 The "*Silicon Valley No Poaching Black-List*" class-action lawsuit was about this issue.  
20 Federal FAR Section 9.104-1 (d), and related laws, apply. Blacklisting is a key part of the IC  
21 Vendetta Cycle attacks. The victims also suffered damage to their rights under the Age  
22 Discrimination in Employment Act (ADEA) (29 USC Sec. 621, et seq.); the Americans with  
23 Disabilities Act (42 USC Sec. 12181, et seq.); the Civil Rights Acts - (42 USC Sec. 2000, et seq.);  
24 the Davis-Bacon Act (40 USC Sec. 276a, et seq.); the Employee Retirement Income Security Act  
25 (ERISA) (29 USC Sec. 1001, et seq.); the Equal Pay Act (29 USC Sec. 206[d]) and other violations.

26 There is a precedent that was set in the US Supreme Court case: *Gideon v. Wainwright*,  
27 (1963) that clarifies that you have a right to a lawyer even if you don't have money for one. The  
28 Sixth Amendment, as applied to the states through the Fourteenth Amendment Due Process Clause

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1 gives one their Due Process rights. You need to kill someone, though, to most easily get your free  
2 lawyer, since the court-appointed lawyer is rarely ever appointed, on citizens behalf, in a case like  
3 this. Even if a defendant is represented by an attorney of his or her choosing, he or she may be  
4 entitled to relief on appeal if the attorney did not provide adequate representation. A defendant must  
5 demonstrate that the attorney's performance "fell below an objective standard of reasonableness"  
6 and that this was prejudicial to the case. See:

7 [Strickland v. Washington](https://supreme.justia.com/cases/federal/us/466/668/case.html) ( <https://supreme.justia.com/cases/federal/us/466/668/case.html> ) ,  
8 466 U.S. 668, 688-92 (1984).

9 A few "free lawyers", that victims had tried, turned out to be working for the opposition  
10 side. The federal organization: <https://www.lsc.gov> is required to help but has refused because it's  
11 administrators were friends with, and appointed by, the public officials charged with corruption in  
12 this case.

## EXHIBIT 14 - Killing The Messenger

Plaintiffs, and their peers, who reported these crimes to authorities, were murdered, character assassinated, black-listed, de-funded, had their social security and state benefits cut-off or blockaded and more.

The FBI, special investigators and Congressional researchers say that there were only a handful of powerful people capable of operating attacks of this scale and sophistication against the Plaintiffs.


In Sweitzer, T. (1996, September). *Kill or be killed*. [Electronic version] Campaigns & Elections, 17(9), 46-47., the process used to “kill” others is described just as it was used against the Plaintiffs. In <https://theintercept.com/2014/02/24/jtrig-manipulation/> the formal process of hired character assassination, exactly as it was used against the Plaintiffs, is detailed. The well-documented process is further outlined in the articles:

### [Character assassination - Wikiquote](#)

 [https://en.wikiquote.org/wiki/Character\\_assassination](https://en.wikiquote.org/wiki/Character_assassination)

**Character assassination** is at once easier and surer than physical assault; and it involves far less risk for the assassin. It leaves him free to commit the same deed over and over again, and may, indeed, win him the honors of a hero in the country of his Plaintiffss. Alan Barth, The Rights of Free Men: An Essential Guide to Civil Liberties (1984).

### [New Snowden Doc Reveals How GCHQ/NSA Use The Internet To ...](#)

 <https://www.techdirt.com/articles/20140224/17054826340/new-snowden-doc-reveals-how-gchqnsa-use-internet-to-manipulate-deceive-destroy-reputations.shtml>

A few weeks ago, Glenn **Greenwald**, while working with NBC News, revealed some details of a **GCHQ** presentation concerning how the surveillance organization had a "dirty tricks" group known as JTRIG ...



1 [Glenn Greenwald on the NSA, GCHQ, and Spying | naked ...](#)

2 [3 !\[\]\(666e09182d4cd268646ea700ea60dcdf\_img.jpg\) https://www.nakedcapitalism.com/2013/10/glenn-greenwald-on-the-nsa-gchq-and-spying.html](https://www.nakedcapitalism.com/2013/10/glenn-greenwald-on-the-nsa-gchq-and-spying.html)

4 Glenn **Greenwald** on the NSA, **GCHQ**, and Spying. Posted on October 4, 2013 by Yves  
5 Smith. Yves here. This BBC NewsInsight interview is a remarkable little piece. **Greenwald**  
6 confronts a clearly hostile set of questions from the BBC interviewer. ... These kinds of remarks are  
7 transparent and vapid and should be dismissed like any other textbook ...

8  
9 [Greenwald: Leaked Docs Reveal Agency's \(GCHQ\) Digital ...](#)

10 [!\[\]\(e3f8612927870f2e0f9f5989e6dd3064\_img.jpg\) https://www.democraticunderground.net/10025241916](https://www.democraticunderground.net/10025241916)

11 **Greenwald:** Leaked Docs Reveal Agency's (**GCHQ**) Digital Propaganda Toolkit. Latest  
12 files provided by Edward Snowden show **GCHQ's** ability to 'manipulate' the Internet using  
13 'hacker's buffet for wreaking online havoc' by Jon Queally, staff writer Common Dreams, July 15,  
14 2014 ...

15  
16 All of the attackers people are U.S. Government senior officials working in the White House  
17 and/or the U.S. Senate and/or their Silicon Valley oligarch political campaign financiers.

18 Every one of the attack technologies and resources were previously deployed against  
19 Presidential candidates in past elections. The providers, operators and compensation conduits of the  
20 attack services are known to law enforcement. The payment records have been uncovered, revealing  
21 that over \$30M of attack services billings and/or in-kind services exchanges were incurred by the  
22 attackers. By way of contrast: \$30M is the typical WEEKLY expenditure for opposition character  
23 assassination programs in a U.S. Presidential election using Gawker, Gizmodo, Facebook, Google  
24 and Fusion GPS media attack services.

25 Plaintiffs, and their peers, swear, warrant and certify that this is true. experts can prove in a  
26 Grand Jury, Civil Jury and Congressional Hearing that White House staff, U.S. Senators and their  
27 Silicon Valley financiers did order, operate and finance a massive “hit-job” on Plaintiffs as  
28 revenge/retribution/vendetta because Plaintiffs reported an organized crime activity involving well

1 known public officials.

2 Every public official who was, by law, supposed to help Plaintiffs have, so far, been proven  
3 by investigators to have been in direct business competition with Plaintiffs.

4 The effort made by political executives to steer the annual expenditure of trillions of dollars  
5 of taxpayer funds and stock market profits to one group of friends or another is called "Cronyism"  
6 and it is operated by U.S. Senators and White House staff for illicit profiteering purposes.

7 The corrupt public officials involved here used real estate, stock market ownership,  
8 revolving door payola jobs and investment bank accounts to profiteer from each deal that the  
9 charged officials pushed.

10 FBI-level tracking of the covert accounts, trusts, shell corporations, family members and  
11 associates of every public official involved in this case proves that they made money by competing  
12 with Plaintiffs business ventures. The Panama Papers Leaks, Swiss Leaks, Snowden Leaks, and all  
13 of the other leaks prove this as fact.

14 The Assassins:

15 - *How A Modern Character Assassination and Political "Kill Order" Was Executed By*  
16 *Politicians, and their Silicon Valley Oligarchs, Against The Plaintiffs:*

17 This is how a vendetta, revenge and political payback operation was implemented against an  
18 American taxpayer when a Senator issued a "kill order" on a whistle-blower

19 Investigations have revealed that the White House and California Senators hired the  
20 character assassination and defamation attack services:

21 **Cardinal & Pine; Pacronym, Acronym; The Americano; Investing in US; Shadow Inc;**  
22 ***Courier Newsroom; IN-Q-Tel; Gawker Media; Jalopnik; Gizmodo Media; K2 Intelligence;***  
23 ***WikiStrat; Podesta Group; Fusion GPS; Clearview AI Face Tracking, Google; YouTube;***  
24 ***Alphabet; Facebook; Twitter; Think Progress; Media Matters); Black Cube; Correct The***  
25 ***Record; Orbis Business Intelligence, Undercover Global Ltd; Stratfor; Jigsaw;***  
26 ***ShareBlue/Acronym; Versa LLC; American Ledger; Supermajority News; New Venture Fund;***  
27 ***Sixteen Thirty Fund; Cambridge Analytica; Sid Blumenthal; States Newsroom; Hopewell Fund;***  
28 ***Open Society.; Palantir, Kroll, David Brock; AmpliFire News; American Bridge; Plouffe***

1 ***Consulting; Pantsuit Nation; MotiveAI; American Bridge 21st Century Foundation; Priorities***  
2 ***USA; PR Firm Sunshine Sachs; The American Independent Foundation; Covington and***  
3 ***Burling; Buzzfeed; The American Independent; Perkins Coie; Secondary Infektion; Wilson***  
4 ***Sonsini*** and thousands more to run hit-jobs, character assassinations, dirty tricks and economic  
5 reprisal attacks on any targets who reported the crimes. Each of those companies are now under  
6 federal and civil investigation. Most of these businesses offer the service of manipulating elections  
7 and news coverage in order to steer stock market profits into the pockets of billionaire clients at the  
8 expense of the taxpayer and Democracy. They hide their transactions via money-laundering. All of  
9 these services, when focused on individual citizens, are lethal.

10       These attackers deserve to be punished for the rest of their lives for taking away the lives of  
11 others in exchange for remuneration. Any company who is corrupt enough to hire any of these  
12 assassins should be forced out of business.

13       These attack services are responsible for 90% of the "Fake News" problem in the world  
14 because they are the authors of most fake news. Congress must act to make these kinds of  
15 companies illegal!

16       These digital assassination services offer hit-jobs, character assassinations and economic  
17 reprisal programs to famous billionaires and corrupt politicians who are seeking revenge, retribution  
18 and vendetta executions.

**EXHIBIT 15 – More Details On The Specific Attacks And Harms Against Plaintiffs**

**Recent leaks and hacks published by ICIJ, Glenn Greenwald, The Guardian, ProPublica and other sources have revealed that White House staff like John Podesta, Robert Gibbs, John Podesta and others; Department of Energy staff like Steven Chu, Lachlan Seward, Matt Rogers and others; Their financiers from Google like Eric Schmidt, Elon Musk, Larry Page and others; contracted intelligence agency spies to assassinate the lives and income of Plaintiffs.**

-----

All of these tactics (And More...) are text book procedures operated daily by CIA, FSB, Mossad, In-Q-Tel, NSA, Chinese Secret Police in the course of their intelligence work. These tactics are widely detailed in leaked CIA and FSB manuals and discussed in length by Glenn Greenwald, Edward Snowden, Julian Assange and others in their writings. California Senators, White House staff and Silicon Valley tech oligarchs are the only known groups to aggressively seek out and hire former employees of the CIA, FSB, Mossad, In-Q-Tel, NSA, and Chinese Secret Police.

The volume and high-end type of attacks, operated against Plaintiffs, prove that the assertions of crimes, at the scope and level asserted in this document, must have happened because there is no other possible reason for these people to have attacked Plaintiffs in these ways.

The attackers all knew each other, benefited from each others actions, shared the same motivations and profits, were all competitive to Plaintiffs, had each threatened Plaintiffs and had their staff whistle-blow on them that they engaged in these crimes! The suspects attacks prove the suspects actions and affiliations.

1 Federal law enforcement, the United States Congress and the highest level investigators in  
2 the U.S., and abroad, have documented (per the “FISA Memo”, Congressional Reports and federal  
3 employee testimony) and proven the fact that the Obama Administration regularly engaged in the  
4 operation of retribution, vendetta and reprisal campaigns known as “hit-jobs” against domestic  
5 natural born U.S. citizen domestic taxpayers. The Federal Court, in at least one previous court case,  
6 has ruled that the corporation in which Plaintiffs were an investor, in this particular matter, were the  
7 Plaintiffs and target of a number of these attacks designed to inflict permanent medical, emotional,  
8 character assassination, brand negation, economic and career damage.

9  
10 **Additional Examples Of The Attackers Methods:**

11  
12 [https://bigleaguepolitics.com/they-literally-know-nothing-ben-rhodes-bragged-about-](https://bigleaguepolitics.com/they-literally-know-nothing-ben-rhodes-bragged-about-manipulating-clueless-reporters/)  
13 [manipulating-clueless-reporters/](https://bigleaguepolitics.com/they-literally-know-nothing-ben-rhodes-bragged-about-manipulating-clueless-reporters/)

14  
15 [https://freedom.press/news/revealed-justice-depts-secret-rules-targeting-journalists-fisa-](https://freedom.press/news/revealed-justice-depts-secret-rules-targeting-journalists-fisa-court-orders/)  
16 [court-orders/](https://freedom.press/news/revealed-justice-depts-secret-rules-targeting-journalists-fisa-court-orders/)

17  
18 [https://freedom.press/news/lawsuit-seeks-government-guidelines-surveillance-journalists-](https://freedom.press/news/lawsuit-seeks-government-guidelines-surveillance-journalists-leak-investigations-surge/)  
19 [leak-investigations-surge/](https://freedom.press/news/lawsuit-seeks-government-guidelines-surveillance-journalists-leak-investigations-surge/)

20  
21 <http://www.attacked.biz>

22  
23 <http://www.google-is-a-mobster.com>

24  
25 <https://knightcolumbia.org/>

26  
27 [https://bigleaguepolitics.com/brennan-and-clapper-accused-of-hacking-john-roberts-to-](https://bigleaguepolitics.com/brennan-and-clapper-accused-of-hacking-john-roberts-to-blackmail-him/)  
28 [blackmail-him/](https://bigleaguepolitics.com/brennan-and-clapper-accused-of-hacking-john-roberts-to-blackmail-him/)

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<https://freedom.press/news/revealed-justice-depts-secret-rules-targeting-journalists-fisa-court-orders/>

<https://bigleaguepolitics.com/heres-why-obama-clearly-ordered-the-spying-on-trump/>

<https://dailycaller.com/2018/09/17/lindsey-graham-dems-kavanaugh/>

<https://www.thegatewaypundit.com/2018/09/okeefe-strikes-again-project-veritas-exposes-doj-official-using-govt-databases-to-stalk-business-owners-video/>

<https://www.politico.com/gallery/16-worst-political-dirty-tricks>

<http://artofverbalwar.com/2016/11/03/quick-dirty-guide-political-debate-tactics/>

<https://politicaldictionary.com/topics/dirty-tricks/>

<https://www.learntoinfluence.com/dirty-tricks-and-office-politics/>

<https://www.motherjones.com/politics/2012/11/election-dirty-tricks/>

<https://www.nytimes.com/2016/10/21/us/politics/video-dnc-trump-rallies.html>

<http://freakonomics.com/2007/11/06/the-complete-history-of-dirty-politics-a-qa-on-anything-for-a-vote/>

<https://en.wikipedia.org/wiki/Ratfucking>

1 [https://www.washingtonpost.com/opinions/the-npr-video-and-political-dirty-tricks/](https://www.washingtonpost.com/opinions/the-npr-video-and-political-dirty-tricks/2011/03/17/ABbyMym_story.html)  
2 [2011/03/17/ABbyMym\\_story.html](https://www.washingtonpost.com/opinions/the-npr-video-and-political-dirty-tricks/2011/03/17/ABbyMym_story.html)

3  
4 [https://www.huffingtonpost.com/rich-rubino/dirty-political-tricks-from-american-](https://www.huffingtonpost.com/rich-rubino/dirty-political-tricks-from-american-politics_b_9324226.html)  
5 [politics\\_b\\_9324226.html](https://www.huffingtonpost.com/rich-rubino/dirty-political-tricks-from-american-politics_b_9324226.html)

6  
7 <http://www.electomatic.com/dirty-campaign-techniques/>

8  
9 <https://en.wikipedia.org/wiki/COINTELPRO>

10  
11 <https://www.cnn.com/2008/POLITICS/05/29/obamas.first.campaign/>

12  
13 [https://www.nytimes.com/2016/11/05/us/politics/dirty-tricks-vandalism-and-the-dark-side-](https://www.nytimes.com/2016/11/05/us/politics/dirty-tricks-vandalism-and-the-dark-side-of-politics.html)  
14 [of-politics.html](https://www.nytimes.com/2016/11/05/us/politics/dirty-tricks-vandalism-and-the-dark-side-of-politics.html)

15  
16 <https://whyy.org/articles/political-dirty-tricks-are-a-staple-of-modern-politics/>

17  
18 [https://www.theguardian.com/uk-news/2018/mar/19/cambridge-analytica-execs-boast-dirty-](https://www.theguardian.com/uk-news/2018/mar/19/cambridge-analytica-execs-boast-dirty-tricks-honey-traps-elections)  
19 [tricks-honey-traps-elections](https://www.theguardian.com/uk-news/2018/mar/19/cambridge-analytica-execs-boast-dirty-tricks-honey-traps-elections)

20  
21 [https://medium.com/@j363j/how-roger-stones-campaign-of-tammany-hall-political-](https://medium.com/@j363j/how-roger-stones-campaign-of-tammany-hall-political-corruption-lead-to-trump-russia-3099d87784e)  
22 [corruption-lead-to-trump-russia-3099d87784e](https://medium.com/@j363j/how-roger-stones-campaign-of-tammany-hall-political-corruption-lead-to-trump-russia-3099d87784e)

23  
24 [https://www.bridgemi.com/detroit-journalism-cooperative/lawsuits-dirty-tricks-and-angry-](https://www.bridgemi.com/detroit-journalism-cooperative/lawsuits-dirty-tricks-and-angry-ex-wife-detroits-ugliest-election)  
25 [ex-wife-detroits-ugliest-election](https://www.bridgemi.com/detroit-journalism-cooperative/lawsuits-dirty-tricks-and-angry-ex-wife-detroits-ugliest-election)

26  
27 [https://www.salon.com/2016/03/25/](https://www.salon.com/2016/03/25/hillary_clintons_dirty_politics_bernie_sanders_is_experiencing_the_same_nasty_tricks_that_clinto)  
28 [hillary clintons dirty politics bernie sanders is experiencing the same nasty tricks that clinto](https://www.salon.com/2016/03/25/hillary_clintons_dirty_politics_bernie_sanders_is_experiencing_the_same_nasty_tricks_that_clinto)



1 [ns campaign dealt obama in 2008/](#)

2  
3 [http://savannahnow.com/opinion-opinion-columns/2016-10-25/cal-thomas-political-dirty-](http://savannahnow.com/opinion-opinion-columns/2016-10-25/cal-thomas-political-dirty-tricks-then-and-now)  
4 [tricks-then-and-now](#)

5  
6 [https://www.cbc.ca/news/politics/5-political-dirty-tricks-we-learned-from-the-robocalls-](https://www.cbc.ca/news/politics/5-political-dirty-tricks-we-learned-from-the-robocalls-trial-1.2669924)  
7 [trial-1.2669924](#)

8  
9 [https://www.reddit.com/r/dredmorbius/comments/2d0r1d/](https://www.reddit.com/r/dredmorbius/comments/2d0r1d/the_reactionary_political_debate_playbook_karl/)  
10 [the reactionary political debate playbook karl/](#)

11  
12 <https://www.politico.com/story/2016/02/south-carolina-dirty-tricks-republicans-219116>

13  
14 [https://www.zerohedge.com/news/2019-02-10/yale-newspaper-publishes-guide-destroying-](https://www.zerohedge.com/news/2019-02-10/yale-newspaper-publishes-guide-destroying-white-boy-lives-using-stasi-tactics)  
15 [white-boy-lives-using-stasi-tactics](#)

16  
17 [https://www.americanthinker.com/blog/2019/02/](https://www.americanthinker.com/blog/2019/02/yale_editor_chillingly_urges_fellow_yalies_to_act_as_a_stasi_to_monitor_white_males.html)  
18 [yale editor chillingly urges fellow yalies to act as a stasi to monitor white males.html](#)

19  
20 [https://russia-insider.com/en/jeff-bezos-nudie-pics-be-released-cyber-tycoon-complains-](https://russia-insider.com/en/jeff-bezos-nudie-pics-be-released-cyber-tycoon-complains-about-loss-privacy/ri26224)  
21 [about-loss-privacy/ri26224](#)

22  
23 <https://www.youtube.com/watch?v=VP5jqLAjbDw>

24  
25 **\*\* 'They Can't Beat Him On The Law So They Are Trying To Destroy His Life' -Sen.**  
26 **Graham Questions Dems' Motives On Brett Kavanaugh Sexual Assault Allegations**  
27 **(dailycaller.com)**  
28

**\*\* !!!!! Mueller Hears That Silicon Valley Has Been Manipulating The Entire BREXIT Campaign !!!!!** Second former employee of controversial data firm to be questioned by special counsel's inquiry into Russia collusion. Per Carole Cadwalladr: Brittany Kaiser is said to be cooperating fully with the Mueller inquiry. A director of the controversial data company Cambridge Analytica, who appeared with Arron Banks at the launch of the Leave.EU campaign, has been subpoenaed by the US investigation into possible collusion between the Trump campaign and the Russian government. A spokesman for Brittany Kaiser, former business development director for Cambridge Analytica – which collapsed after the Observer revealed details of its misuse of Facebook data – confirmed that she had been subpoenaed by special counsel Robert Mueller, and was cooperating fully with his investigation. He added that she was assisting other US congressional and legal investigations into the company's activities and had voluntarily turned over documents and data.

Kaiser, who gave evidence to the UK parliament last April in which she claimed Cambridge Analytica had carried out in-depth work for Leave.EU, is the second individual connected to the firm subpoenaed by the special counsel. The Electoral Commission has said its investigation into Leave.EU found no evidence that the campaign “received donations or paid for services from Cambridge Analytica ...beyond initial scoping work”. Damian Collins, chairman of parliament's inquiry into fake news, said it was “no surprise” that Kaiser was under scrutiny by Mueller because “her work connected her to WikiLeaks, Cambridge Analytica and [its parent company] SCL, the Trump campaign, Leave.EU and Arron Banks”. He said it was now vital Britain had its own inquiry into foreign interference: “We should not be leaving this to the Americans.”

**\*\* CBS NEWS 60 MINUTES Lara Logan "I'm Being 'Targeted' . Per** Tamar Auber: former CBS News foreign correspondent Lara Logan spoke with Fox News Sean Hannity about her recent comments slamming the media as “mostly liberal.” Logan told Breitbart podcaster Mike Ritland the remarks made on his show — which drew widespread attention online — amounted to “professional suicide.” Defending her remarks on Hannity's show, Logan said that as the result of her speaking out about how the media is “mostly liberal” she has been targeted because she is an

1 independent voice. “Any journalists who are not beating the same drum and giving the same talking  
2 points,” she insisted “pay the price” for not going along with the liberal crowd. She also called out  
3 her targeters by name.


4 “I know they’re going to come after me,” she told Hannity. “Michael Calderone who is at  
5 the Huffington Post. I can give you the script now. I can tell you who the players are. Joe Hagan.  
6 Brian Stelter.” She added: “They smear you personally. They go after your integrity. They go after  
7 your reputation as a person and a professional. They will stop at nothing. I am not the only one. And  
8 I am just, I am done, right, I am tired of it. And they do not get to write my story anymore. They  
9 don’t get to speak for me, I want to say loudly and clearly to anybody who is listening, I am not  
10 owned. Nobody owns me, right? I’m not owned by the left or the right.” Logan made headlines  
11 recently when, during a scorched earth podcast interview with Ritland, she said that there was a lot  
12 of “weight” in most news organizations on “one side of the political spectrum.” “The media  
13 everywhere is mostly liberal. But in this country, 85 percent of journalists are registered Democrats.  
14 So that’s just a fact, right?” she told Ritland. She also trashed reporting based on single, anonymous  
15 government sources. “That’s not journalism, that’s horseshit,” Logan stressed. “Responsibility for  
16 fake news begins with us. We bear some responsibility for that, and we’re not taking ownership of  
17 that and addressing it. We just want to blame it all on somebody else.”

18  
19 **\*\* Internal documents from a private Israeli intelligence firm called Psy-Group** show  
20 that, at the time of many incidents, the company, and possibly other private investigators, were  
21 targeting U.S. citizens because they spoke up about crimes. Psy-Group’s intelligence and influence  
22 operations, which included a failed attempt in the summer of 2017 to sway a local election in  
23 central California, were detailed in a New Yorker investigation that I co-wrote earlier this month.  
24 Before it went out of business (ie: changed it's name) , last year, Psy-Group was part of a new wave  
25 of private-intelligence firms that recruited from the ranks of Israel’s secret services and described  
26 themselves as “private Mossads.” Psy-Group initially stood out among its rivals because it didn’t  
27 just gather intelligence; its operatives used false identities, or avatars, to covertly spread messages  
28 in an attempt to influence what people believed and how they behaved. In 2016, Psy-Group held

1 discussions with the Trump campaign and others about conducting covert “influence” operations to  
2 benefit the candidate. Psy-Group’s founder and C.E.O., Royi Burstien, a veteran Israeli intelligence  
3 officer who established the firm in 2014, told me that his talks with the Trump campaign went  
4 nowhere. The company’s posturing, however, attracted the attention of Robert Mueller, the special  
5 counsel, who has been investigating interference in the 2016 Presidential race.'

6  
7       **\*\* FED BOMBHELL: Fusion GPS Bribed Dozens of MSM Journalists With Cash To**  
8 **Run Character Assassinations.** High-ranking FBI insiders are pulling back the curtain on Fusion  
9 GPS, the firm that commissioned and spread the bogus Trump dossier. It appears the embattled  
10 intelligence firm was quite busy paying off Big Media reporters, according to federal sources who  
11 have traced dozens of transactions between TD Bank and media members as well as media  
12 organizations, sources confirm. But stunningly, Big Media organizations have employed Fusion  
13 GPS to dig dirt on politicians and D.C.’s elite — namely Donald Trump. “Fusion GPS was on the  
14 payroll of the media and in turn had members of the media on its payroll,” one FBI insider said. FBI  
15 insiders confirm Fusion GPS employed law firms as well as shell companies to send and receive  
16 funds to and from media and reporters. But the embattled firm also used its accounts at TD Bank to  
17 directly commission reporters. Likewise, Fusion GPS received funds from media companies into its  
18 own accounts at TD Bank, FBI insiders said, “There are dozens of payments from the media  
19 flowing into their (Fusion GPS’) account,” one federal law enforcement official said. “One  
20 company wired funds to Fusion (GPS) more than a dozen times.” Why would media companies  
21 commission Fusion GPS? Likely to dig dirt on enemies or secure records that reporters could not  
22 legally obtain, one federal law enforcement insider said. One FBI insider said the payments to  
23 Fusion GPS coincide with Donald Trump’s run for the White House. The payments were made  
24 between Sept. 2015 and Sept. 2017, records show. The unthinkable: The mainstream media paying  
25 Fusion GPS for dirt on Trump to the same firm the Democratic National Committee paid to fund the  
26 bogus Trump dossier. And at the same time Fusion GPS bribing journalists to place stories — likely  
27 negative about Trump, as well as spread the bogus Trump dossier around.

1       \*\* [Death By Metadata: Jeremy Scahill & Glenn Greenwald Reveal ...](#)

2        [https://www.democracynow.org/2014/2/10/death\\_by\\_metadata\\_jeremy\\_scahill\\_glenn](https://www.democracynow.org/2014/2/10/death_by_metadata_jeremy_scahill_glenn)

3       Jeremy Scahill and Glenn **Greenwald** have also revealed ... And the source then is in  
4       addition to the **documents** that Edward **Snowden** ... "The NSA's Secret Role in the U.S.


5       **Assassination Program** ...

6  
7       \*\* [How Covert Agents Infiltrate the Internet to Manipulate ...](#)

8        <https://theintercept.com/2014/02/24/jtrig-manipulation/>

9       But, here, I want to focus and elaborate on the overarching point revealed by all of these  
10       **documents**: namely, that these agencies are attempting to control, infiltrate, manipulate, and warp  
11       online ...

12  
13       \*\* [New Snowden Doc Reveals How GCHQ/NSA Use The Internet To ...](#)

14        [https://www.techdirt.com/articles/20140224/17054826340/new-snowden-doc-reveals-](https://www.techdirt.com/articles/20140224/17054826340/new-snowden-doc-reveals-how-gchqnsa-use-internet-to-manipulate-deceive-destroy-reputations.shtml)  
15       [how-gchqnsa-use-internet-to-manipulate-deceive-destroy-reputations.shtml](#)

16       A few weeks ago, Glenn **Greenwald**, while working with NBC News, revealed some details  
17       of a GCHQ presentation concerning how the surveillance organization had a "dirty tricks" group  
18       known as **JTRIG** ...

19  
20       \*\* Snowden Drip: Government Funded Character Assassination Squads Rampant Online  
21       From [The Intercept](#):

22       One of the many pressing stories that remains to be told from the Snowden archive is how  
23       western intelligence agencies are attempting to manipulate and control online discourse with  
24       extreme tactics of deception and reputation-destruction. It's time to tell a chunk of that story,  
25       complete with the relevant documents.

26       Over the last several weeks, I worked with *NBC News* to publish a [series](#) (  
27       [http://investigations.nbcnews.com/\\_news/2014/01/27/22469304-snowden-docs-reveal-british-spies-](http://investigations.nbcnews.com/_news/2014/01/27/22469304-snowden-docs-reveal-british-spies-snooped-on-youtube-and-facebook?lite)  
28       [snooped-on-youtube-and-facebook?lite](#) ) of [articles](#) (

1 [http://www.nbcnews.com/news/investigations/war-anonymous-british-spies-attacked-hackers-](http://www.nbcnews.com/news/investigations/war-anonymous-british-spies-attacked-hackers-snowden-docs-show-n21361)  
2 [snowden-docs-show-n21361](http://www.nbcnews.com/news/investigations/war-anonymous-british-spies-attacked-hackers-snowden-docs-show-n21361) ) about [“dirty trick” tactics](#) (  
3 [http://www.nbcnews.com/news/investigations/snowden-docs-british-spies-used-sex-dirty-tricks-](http://www.nbcnews.com/news/investigations/snowden-docs-british-spies-used-sex-dirty-tricks-n23091)  
4 [n23091](http://www.nbcnews.com/news/investigations/snowden-docs-british-spies-used-sex-dirty-tricks-n23091) ) used by GCHQ’s previously secret unit, JTRIG (Joint Threat Research Intelligence  
5 Group). These were based on [four classified GCHQ documents](#) (  
6 [http://msnbcmedia.msn.com/i/msnbc/sections/news/snowden\\_anonymous\\_nbc\\_document.pdf](http://msnbcmedia.msn.com/i/msnbc/sections/news/snowden_anonymous_nbc_document.pdf) )  
7 presented to the NSA and the other three partners in the English-speaking [“Five Eyes” alliance](#)  
8 ( [http://www.theatlantic.com/politics/archive/2013/06/is-the-five-eyes-alliance-conspiring-to-spy-](http://www.theatlantic.com/politics/archive/2013/06/is-the-five-eyes-alliance-conspiring-to-spy-on-you/277190/)  
9 [on-you/277190/](http://www.theatlantic.com/politics/archive/2013/06/is-the-five-eyes-alliance-conspiring-to-spy-on-you/277190/) ) . Today, we at *the Intercept* are publishing [another new JTRIG document](#)  
10 ( [https://firstlook.org/theintercept/document/2014/02/24/art-deception-training-new-generation-](https://firstlook.org/theintercept/document/2014/02/24/art-deception-training-new-generation-online-covert-operations/)  
11 [online-covert-operations/](https://firstlook.org/theintercept/document/2014/02/24/art-deception-training-new-generation-online-covert-operations/) ) , in full, entitled “The Art of Deception: Training for Online Covert  
12 Operations.”

13 By publishing these stories one by one, Plaintiffs NBC reporting highlighted some of the  
14 key, discrete revelations: the monitoring of YouTube and Blogger, the targeting of Anonymous with  
15 the very same DDoS attacks they accuse “hacktivists” of using, the use of “honey traps” (luring  
16 people into compromising situations using sex) and destructive viruses. But, here, I want to focus  
17 and elaborate on the overarching point revealed by all of these documents: namely, that these  
18 agencies are attempting to control, infiltrate, manipulate, and warp online discourse, and in doing  
19 so, are compromising the integrity of the internet itself.

## 20 **Recap Of Attack Tactics Used**

21 *POLITICAL KILL ORDERS AND STATE-SPONSORED CHARACTER ASSASSINATIONS - How A*  
22 *Modern Character Assassination and Political "Kill Order" Is Executed By the Silicon Valley*  
23 *Oligarchs and their total control of propaganda media. Patrick George At Jalopnik attacks*  
24 *outsiders under contract with Elon Musk and the DNC. Silicon Valley campaign finance oligarchs*  
25 *hire him to run hatchet jobs on innocent outsiders and then Gawker-Gizmodo-Jalopnik uses their*  
26 *financial partnership with the DNC's Google to push the character assassination articles to the top*  
27 *of Google web products and searches.*  
28

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1  
2 Patrick George, Adrian Covert, John Hermann and Nick Cook are the sexually degenerate cabin  
3 boys that report to boy-loving sleaze-tabloid oligarch Nick Denton. They created the Fake News  
4 crisis in the media by flooding the internet with defamation posts and reprisal hatchet job articles  
5 designed to damage political enemies of the Socialists. They coordinate a large number of the  
6 character assassination efforts at Gawker, Gizmodo, Jalopnik, CNN, New York Times and other  
7 propaganda outlets. These Millennial boys are "Media Rapists" and should be treated as abusers. -  
8  
9 How and why did a Donald Trump stripper-date named "Stormy" or an Elon Musk sex party or a  
10 Kavanaugh drinking incident or the Moonves and Weinstein indiscretions suddenly hit the news at  
11 about the same time in news history? -

12  
13 In addition to actual murder, Politicians and Silicon Valley Oligarchs hire operatives to end  
14 people's lives in other creative ways. - It is all part of the modern trend in vendetta, revenge and  
15 political payback when a Senator or a tech oligarch issues a "kill order" on an opponent. - The  
16 client does not like to get their hands dirty so the actual social hit job is performed by companies  
17 such as: IN-Q-Tel - (DNC); Gawker Media - (DNC); Jalopnik - (DNC); Gizmodo Media - (DNC);  
18 K2 Intelligence - (DNC); WikiStrat - (DNC); Podesta Group - (DNC); Fusion GPS - (DNC/GOP);  
19 Google - (DNC); YouTube - (DNC); Alphabet - (DNC); Facebook - (DNC); Twitter - (DNC); Think  
20 Progress - (DNC); Media Matters - (DNC); Black Cube - (DNC); Mossad - (DNC); Correct The  
21 Record - (DNC); Sand Line - (DNC/GOP); Blackwater - (DNC/GOP); Undercover Global Ltd  
22 (DNC/GOP) Stratfor - (DNC/GOP); ShareBlue - (DNC); Wikileaks (DNC/GOP); Cambridge  
23 Analytica - (DNC/GOP); Sid Blumenthal- (DNC); David Brock - (DNC); PR Firm Sunshine Sachs  
24 (DNC); Covington and Burling - (DNC), BuzzFeed - (DNC) Perkins Coie - (DNC); Wilson Sonsini -  
25 (DNC) and hundreds of others...These are the people and companies that except cash, revolving  
26  
27  
28



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1 door jobs, political appointments, insider trading stock in Silicon Valley tech companies, prostitutes  
2 and real estate in exchange for destroying the lives of others. -

3  
4 These attackers deserve to be punished for the rest of their lives for taking away the lives of others  
5 in exchange for cash. Any company who is corrupt enough to hire any of these assassins should be  
6 forced out of business. These attack services are responsible for 90% of the "Fake News" problem  
7 in the world because they are the authors of most fake news. Congress must act to make these kinds  
8 of companies illegal! - These digital assassination services offer hit-jobs, character assassinations  
9 and economic reprisal programs to famous billionaires and corrupt politicians who are seeking  
10 revenge, retribution and vendetta executions. -

11  
12  
13 In the case of reporters getting targeted for attacks, President Donald Trump has been accused by  
14 the liberal corporate media of whipping up a hateful frenzy against the press. But while CNN's Jim  
15 Acosta grandstands against Trump, real journalists are still reeling from the draconian  
16 extrajudicial measures that Barack Obama and his administration used to target them for exposing  
17 truth. - This secretive targeting occurred while Obama speechwriter and hate-filled ANTIFA  
18 supporter Ben Rhodes was running "Operation Echo Chamber," which reportedly continues, in  
19 which he fed information to willing corporate media scribes. "They literally know nothing," Rhodes  
20 said of the twentysomething journalists he easily manipulated. - The Freedom of the Press  
21 Foundation's Trevor Timm published documents showing how former attorney general Eric Holder  
22 changed the rules to more effectively intimidate and surveil members of the press. -

23  
24  
25  
26 Timm writes: "Today, we are revealing—for the first time—the Justice Department's rules for  
27 targeting journalists with secret FISA court orders. The documents were obtained as part of a  
28 Freedom of Information Act lawsuit brought by Freedom of the Press Foundation and Knight First

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1 *Amendment Institute at Columbia University.” - Obama is also clearly linked to the plot to obtain*  
2 *fraudulent FISA warrants on President Trump’s team, as evidenced by Peter Strzok and Lisa*  
3 *Page’s texts confirming that Obama was overseeing their fly-by-night operation. - Larry Schweikart*  
4 *reported for Big League Politics: For months pundits and researchers have been pondering the*  
5 *mystery of the FISA approval that led to the illegal and historically titanic scandals to ever hit The*  
6 *U.S. Government . Some have argued that Assistant Attorney General Rod Rosenstein knew the*  
7 *FISA was bogus when he extended it. Others have wondered if Special Counsel Robert Mueller*  
8 *knew about the fraudulent basis of the FISA when he used it, in part, to indict Michael Flynn. Other*  
9 *still, that Mueller was fooled by the FBI. This is what President Trump calls “SPYGATE”. -*

11  
12 *It may well be that the surveillance that was conducted began with UK intelligence services and*  
13 *then was fed back to the White House of Barack Obama. Here’s the kicker: President Barack*  
14 *Obama did not need a FISA warrant to authorize spying/electronic surveillance on Trump because*  
15 *Obama all along had legal authorization to by-pass the normal court vetting process. According to*  
16 *50 U.S. Code 1802, the “Electronic Surveillance Authorization” () “Foreign intelligence in relation*  
17 *to a US person (Trump or his associates) is information that’s necessary for the US to protect*  
18 *against attack, hostile acts, sabotage, . . . as well as other clandestine activities by a foreign power .*  
19 *. . OR . . . information relevant to national defense/security of the US, or the conduct of foreign*  
20 *affairs of the U.S.” Such an authorization by Obama required certification by Attorney General*  
21 *Loretta Lynch that must be logged with the FISC court. (“The [AG]+ shall immediately transmit*  
22 *under seal to the court [FISC] a copy of his certification.”) -*

23  
24  
25  
26 *In short, the DOJ has this. If we are correct, a copy of that certification is currently under seal at*  
27 *least with the DOJ and the FISC. - This is what they are hiding. - However, the Act requires the AG*  
28 *to keep the Select Committee on Intelligence and the Senate Committee on Intelligence informed of*

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1 these authorizations and unmaskings therein. See 1803 (a) (1) (C) If indeed this is what happened,  
2 did Lynch report—or only selectively report—to the committees in a way that excluded non-  
3 friendlies? Can you see why Adam Schiff, Mark Warner, and their ilk are terrified? - These are the  
4 playbook tactics that Senators and tech oligarchs most often use to destroy the lives of their  
5 political and business enemies: - Government agency bosses sometimes solicit the target victims  
6 with false promises of future loans, contracts or grants from their agency and cause the target  
7 victims to expend millions of dollars and years of their time for projects which those government  
8 bosses had covertly promised to their friends. They use the target victims as a “smokescreen” to  
9 cover their illegal government slush-funds for the victims competitors and personal enemies.  
10

11  
12 By using this tactic, the attackers can drain the target victims funds and force them into an  
13 economic disaster in plain view of everyone without the government bosses fearing any reprisal for  
14 their scam.- Every match.com, okcupid.com, Plenty Of Fish, Seeking Arrangements and all other  
15 IAC-owned, or similar, dating sites (IAC is managed by Hillary Clinton's daughter) have had their  
16 profiles, texts, and inter-member communications, since those companies were started, hacked or  
17 purchased. The attack service providers use Palantir and In-Q-Tel financed data analysis software  
18 to analyze every activity in those dating services in order to find honey-trap, blackmail, sextortion  
19 and social conflict exploitation opportunities. If you had a bad date with someone, that someone  
20 will be hunted down and convinced to help harm, #metoo or "rape charge" the intended target.  
21  
22

23  
24 All dates involve a search for sex, so the likelihood that a sexual disappointment experience will  
25 exist in each persons dating history is high. Searching every past dating email and text of a subject  
26 is quite easy with modern software and hacking techniques. A synthetically amplified, PR-agency  
27 optimized sex scandal can destroy any target. Your dating experiences from the 70's or 80's will  
28 come back to haunt you decades later. Most dates involve drinking alcohol and taking drugs. If you

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1 were unattractive or had bad sexual skills your bad date will be called "date rape", "drugging your  
2 date for sex" and related twisted narratives that are designed to shame you, the target. If you try to  
3 get a date in the future, your potential date will be contacted by a third party who will slander and  
4 libel you to make sure your potential first date gets canceled.

5  
6 Your social life will, essentially, end. Every photo on every dating site is cross checked with every  
7 other photo on the internet in order to cull your Facebook, LinkedIn, Snapchat and other social  
8 media together to create a total psychological manipulation profile data file on you. A single photo  
9 on a dating site can be cross searched on every mugshot archive, photo album and corporate  
10 database in the worth within minutes using modern super-computers.

11  
12  
13 Your sex life will be on public record in a flash.- Social Security, SSI, SDI, Disability and other  
14 earned benefits are stone-walled. Applications of targets are "lost". Files in the application process  
15 "disappeared". Lois Lerner hard drive "incidents" are operated in order to seek to hide  
16 information and run cover-ups. - Government officials and tech oligarchs contact members of the  
17 National Venture Capital association (NVCA) and created national "black-lists" to blockade target  
18 victims from ever receiving investor funding.

19  
20  
21 This was also confirmed in a widely published disclosure by Tesla Motors Daryl Siry and in  
22 published testimony. If Silicon Valley political campaign finance oligarchs black-list you (see the  
23 "AngelGate" Scandal and the "High Tech No Poaching Class Action Lawsuit" cases) you will never  
24 get investor funding again. - FOIA requests are hidden, frozen, stone-walled, delayed, lied about  
25 and only partially responded to in order to seek to hide information and run cover-ups.- State and  
26 federal employees will play an endless game of Catch-22 by arbitrarily determining that deadlines  
27  
28

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1 had passed that they, the government officials, had stonewalled and obfuscated applications for, in  
2 order to force these deadlines that they set, to appear to be missed.

3  
4 Nobody has been able to find a living billionaire who is not a clinical sociopath. Each of the  
5 billionaires hold parties, conferences, and snooty get-togethers, annually, where they gather people  
6 together who, they believe, are willing to think and act sociopathically like them too. At these self-  
7 aggrandizing, frat-house, indulgence-fests they seek to plot the control of media and politics to  
8 manipulate the world to be like they see it. The events are known as Bilderberg, Renaissance  
9 Weekend, TED, Aspen, etc. The "speakers" speak propaganda and indoctrination subtleties. The  
10 "round tables" push a consistent propaganda theme. The prostitutes and rent boys are carefully  
11 disguised as "assistants". Those who question the party line are black-listed from future invites.  
12

13  
14 This can bankrupt a target victim.- Some Victims found themselves strangely poisoned, not unlike  
15 the Alexander Litvenko case. Heavy metals and toxic materials were found right after their work  
16 with The U.S. Government weapons and energy facilities. Many wonder if these "targets" were  
17 intentionally exposed to toxins in retribution for their testimony. The federal MSDS documents  
18 clearly show that a number of these people were exposed to deadly compounds and radiations, via  
19 GOVT, without being provided with proper HazMat suits which GOVT officials knew were  
20 required. - Victims employers are called, and faxed, and ordered to fire target victims from their  
21 places of employment, in the middle of the day, with no notice, as a retribution tactic. - On orders  
22 from Obama White House officials, DNC-financed Google, YouTube, Gawker Media and Gizmodo  
23 Media produce attack articles and defamation videos.  
24  
25

26  
27 Google locks this attack media on the internet on the top line, of the front page of all Google  
28 searches for a decade in front of 7.5 billion people, around the world. This attack-type uses over

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1 \$40 million dollars in server farms, production costs and internet rigging. The forensic data  
2 acquired from tracking some of these attacks proves that Google rigs attacks against individuals on  
3 the internet and that all of Google's "impressions" are manually controlled by Google's executives  
4 who are also the main financiers and policy directors of the Obama Administration.

5  
6 This data was provided to the European Union for it's ongoing prosecution of Google's political  
7 manipulation of public perceptions. - Victims HR and employment records, on recruiting and hiring  
8 databases, are embedded with negative keywords in order to prevent the victim targets from ever  
9 gaining future employment. - Gary D. Conley, Seth Rich, Rajeev Motwani and many other whistle-  
10 blowers in these matters, turned up dead under strange circumstances.

11  
12  
13 It is very possible that some of these attack services, operated by former CIA operatives, even offer  
14 discrete murder-for-sale services using high-tech assassination tools that make murders look like  
15 heart attacks and brain failures. - Disability and VA complaint hearings and benefits are frozen,  
16 delayed, denied or subjected to lost records and "missing hard drives" as in the Lois Lerner case.-  
17 Paypal (A DNC-biased operation) and other on-line payments for on-line sales are de-platformed,  
18 delayed, hidden, or re-directed in order to terminate income potential for target victims who  
19 competed with the attackers interests and holdings.-

20  
21  
22 DNS redirection, "website spoofing" sends target victims websites to dead ends where no sales  
23 orders or customer inquiries actually get back to the target. These internet revenue activity  
24 manipulations are conducted using Google and Amazon servers. All commercial storefronts and on-  
25 line sales attempts by target victims, will have had their sites hidden, or search engine de-linked by  
26 a massively resourced facility located in Virginia, Texas or Palo Alto, California in order to  
27 terminate revenue potentials for the target victims.-  
28

1  
2 Over 50,000 trolls, shills, botnets and synth-blog deployments are deployed to place defamatory  
3 statements and disinformation about victims in front of 7.5 billion people around the world on the  
4 internet in order to seek to damage their federal testimony credibility by a massively resourced  
5 facility. - Campaign finance dirty tricks contractors are hired by campaign financiers to attack the  
6 friends and family members of the target victim in order to create low morale for the target victims  
7 psyche and motivation.-  
8

9  
10 Are you getting weird headaches and hearing a "buzzing sound" in your head? The U.S.  
11 Government has now acknowledged that the Cuban, Chinese and other embassy "sonic attacks"  
12 are from a known microwave beam weapon. Any one of the technical departments of the attack  
13 services listed at the top of this article can build such a biological harassment weapon. It can be  
14 aimed at the target victims office, bedroom or vehicle and, within a week, have caused biological  
15 and emotional damage using a weapon that has no visible track of trajectory. It is designed to make  
16 the target victim think they are "going crazy" or "hearing sounds in their head".-  
17

18  
19 In one case covert political partner: Google, transferred large sums of cash to dirty tricks  
20 contractors and then manually locked the media portion of the attacks into the top lines of the top  
21 pages of all Google searches globally, for years, with hidden embedded codes in the links and web-  
22 pages which multiplied the attacks on Victims by many magnitudes.- Covert Cartel financier:  
23 Google, placed Google's lawyer: Michelle Lee, in charge of the U.S. Patent Office and she, in turn,  
24 stacked all of the U.S. Patent Office IPR and ALICE review boards and offices with Google-  
25 supporting employees in order to rig the U.S. Patent Office to protect Google from being  
26 prosecuted for the vast patent thefts that Google engages in. Google has hundreds of patent  
27  
28



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1 lawsuits for technology theft and a number of those lawsuits refer to Google's operations as  
2 "Racketeering", "Monopolistic Cartel" and "Government Coup-like" behaviors.

3  
4 Thousands of articles and investigations detail the fact that Google, "essentially" ran the Obama  
5 White House and provided over 80% of the key White House staff. A conflict-of-interest unlike any  
6 in American history. Google's investors personally told Applicant they would "kill him". Google  
7 and the Obama Administration were "the same entity". Applicant testified in the review that got  
8 Michelle Lee terminated and uncovered a tactical political and social warfare group inside Google  
9 who were financed by Federal and State funds. - Honeytraps and moles were employed by the  
10 attackers. In this tactic, people who covertly worked for the attackers were employed to approach  
11 the "target" in order to spy on and misdirect the subject. - Gawker Media, Gizmodo Media, Snopes,  
12 SPLC and other hired media assassins will be retained to produce "hatchet job" character  
13 assassination articles about you. Then those articles will be faxed, mailed and emailed to your  
14 employer and investors with a note saying: "You don't want to have anything to do with this person,  
15 do you..?" in order to get you fired from your job and get your loans or financing pulled.  
16  
17

18  
19 The attackers will use their round one attack media, that they authored, to create a round two  
20 second wave attack designed to end your life via economic warfare.- Mortgage and rental  
21 applications will have had red flags added to them in databases to prevent the targets from getting  
22 homes or apartments.- Krebs On Security, Wired, Ars Technica, The Wall Street Journal and most  
23 major IT publications have reported that hundreds of spy "back-doors" have been found on every  
24 Intel, AMD, Apple, Xfinity, Cisco, Microsoft, Juniper Networks motherboard, chip-set and  
25 hardware component set. This means that any kid with the "key" code can open any computer,  
26 server, router, cloud-network or other network connected device and read every file, photo, video,  
27 your calendar and email on your devices at any time from any location on Earth.  
28

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1  
2 *The key codes have been released to every hacker community in the world for over ten years. There*  
3 *is now no government, corporate or personal data that can't be hacked, even data from decades*  
4 *ago. Every single one of your darkest secrets can be in the hands of your enemy within 60 minutes,*  
5 *or less. Important meetings you had planned with potential investors, employers, clients, dates,*  
6 *suppliers and others will suddenly get canceled at the last minute.*

7  
8  
9 *They will get canceled because your enemies are reading your calendar remotely and covertly*  
10 *sending slander information to those you had hoped to engage with in order to sabotage your life.*  
11 *Nothing you have ever typed on a computer or Smartphone is safe. it WILL be acquired and it WILL*  
12 *be used against you. - McCarthy-Era "Black-lists" are created and employed against target victims*  
13 *who competed with Obama Administration executives and their campaign financiers to prevent*  
14 *them from getting funding and future employment. - Obama Administration targets were very*  
15 *carefully placed in a position of not being able to get jobs, unemployment benefits, disability*  
16 *benefits or acquire any possible sources of income.*

17  
18  
19 *The retribution tactics were audacious, overt..and quite illegal. - There are thousands of additional*  
20 *Dirty Tricks tactics being used by these Attack Services yet Congress refuses to pass laws out-*  
21 *lawing such attack services. The cost of an attack on a person ranges from \$150,000.00 to over*  
22 *\$50,000,000.00. While a Silicon Valley billionaire can afford to launch counter-measures to these*  
23 *attacks, any regular taxpayer will be utterly destroyed, and incapable of fighting back, against even*  
24 *the smallest version of one of these "kill orders".*

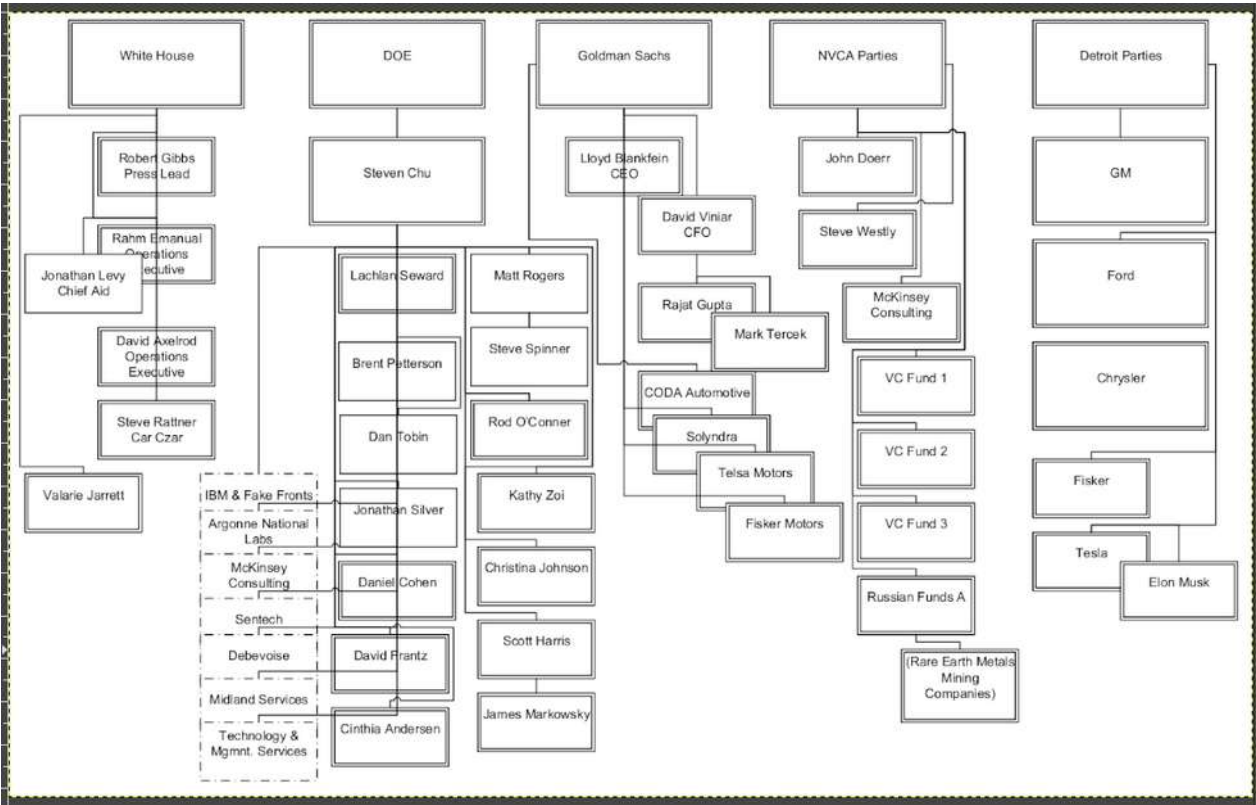
25  
26  
27 *A number of modern office shootings are the results of these attacks against an individual who has*  
28 *lost everything because of the attack and has no options left. - Federal law enforcement, the United*

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1 States Congress and the highest level investigators in the U.S., and abroad, have documented (per  
2 the “FISA Memo”, Congressional Reports and federal employee testimony) and proven the fact that  
3 the Obama Administration regularly engaged in the operation of retribution, vendetta and reprisal  
4 campaigns known as “hit-jobs” against domestic natural born U.S. citizen domestic taxpayers.  
5

6 The Federal Court, in at least one previous court case,has ruled that Applicants, in this particular  
7 matter, were the victims and target of a number of these attacks designed to inflict permanent  
8 medical, emotional, character assassination, brand negation, economic and career damage. The FBI  
9 has been asked to interview John Cook, Nicholas Guido Denton, Adrian Covert, Patrick George, Ian  
10 Fette and John Hermann of Gawker/Gizmodo re: their financing, payola and hit-job attacks on third  
11 parties.  
12  
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**EXHIBIT 16 - Proof Of These Assertions**

Attached Exhibits, Additional Exhibits available in discovery phase, Videos referenced as exhibits, FINCEN files, FBI files, DOJ files, FTC files, FEC files, OSC files, OGE files, Pacer.gov court records, Leaked emails of perpetrators, Phone surveillance records, Bank records, Stock market transaction records, iPhone cloudcasts of meetings, Zoom recordings, DOE recordings of meetings, DOE powerpoints, Goldman Sachs emails, Private email accounts of public officials, Checking account records of public officials, Social media account postings of public officials, Meet-Up records of attendance by perpetrators, Eventbrite records of political event attendance by officials, Tax records of officials, Internet posted photographs of events attended by public officials, Uber and Lyft records of transport of persons for public officials, ad such other law enforcement and intelligence records.

## **EXHIBIT 17 – Analyzing The Attackers The White House Hired**

Let's take a look at one of the attackers, known as "OBAMA AND DIANNE FEINSTEIN'S HIT MAN"

Daniel Jones is Dianne Feinstein's CIA-trained hit-man attack dog. He is sent out to target reporters and constituents that raise the ire of Ms. Feinstein. He hires Fusion GPS, Black Cube, Media Matters, Google, Gawker and other media assassins to destroy those who speak ill of the wicked witch of the West.

He has the eyes of Tony Perkin's in Alfred Hitchcock's film: Psycho. He has the haircut of an out-of-touch hipster. His latest shtick is as an apologist for the 9-11 terrorists that killed thousands of American's in the most horrific ways imaginable. You see, Daniel is very upset that the terrorists got caught and then the army threw cold water on them and they got chilly. Awwwww Poor Terrorists...

Let's compare the cold terrorist to the innocent workers that had to jump off the top of the World Trade Center, while on fire, and watch the ground rise up to crush them into pulp. You could also compare the chilly terrorist to the passengers in the jets who watched the ball of flame race down the central aisle of their jetliners and burn all of the skin off of them as they died in agony. The old World Trade Center was very tall and those who died had a comparatively long time to watch their own deaths.

Some people want the captured terrorists to get hauled up to the top of the new World Trade Center, set on fire, and get to go skydiving without a parachute. Daniel Jones wouldn't like that. He has a soft spot for those who kill American's in horrible ways.

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1 Daniel uses his “opposition research” CIA tools to kill American’s every day. He puts their  
2 most shameful secrets on every online outlet, for decades, in order to end their lives simply because  
3 they said that “Dianne Feinstein is corrupt”. Why isn’t Daniel in prison? Could he use a splash of  
4 cold water to shock him into the real world?

5  
6 His perspective, as an extremist political zealot, is that he would give his life for Dianne and  
7 her crony cadre of stock market manipulators, as long as he could rationalize, like Hitler, that the  
8 ends justifies the means. Why hasn’t Congress had an investigation of this guy? He is such a  
9 narcissist that he got a feature film made about himself to promote his self-aggrandization interests.  
10 He leveraged the film to only show him as a “hero” who supports terrorists and got the film to hide  
11 all of his dirty tricks and insider machinations.

12  
13 Daniel J. Jones is a researcher and former intelligence analyst who heads the advocacy  
14 organizations [Democracy Integrity Project](#) and Advance Democracy, and works as president of the  
15 Penn Quarter Group, an opposition research firm. Prior to taking those positions, he was a staffer for  
16 U.S. Senator Dianne Feinstein (D-CA) and the Democratic staff of the Senate Intelligence  
17 Committee. [\[1\]](#)

18 Senate Republicans alleged that his organizations worked with controversial opposition  
19 research firm [Fusion GPS](#) and former British intelligence officer Christopher Steele, the operative  
20 who circulated a dossier of unverified allegations against then-candidate Donald Trump to media,  
21 politicians, and law enforcement after the 2016 election. [\[2\]](#)[\[3\]](#)

22 As a Senate Intelligence Committee staff member, Jones authored the “Senate Torture  
23 Report” that publicized CIA detention and interrogation techniques and has been used in the  
24 defense of accused terrorists. [\[4\]](#)

25 Jones is a graduate of Elizabethtown College in Pennsylvania and holds master’s degrees in  
26 teaching from Johns Hopkins University and public policy from Harvard University. [\[5\]](#) He  
27 participated in the [Teach for America](#) program before joining the FBI as an international  
28 intelligence analyst in 2003. [\[6\]](#)



Senate Intelligence Committee

In 2007, Jones joined the U.S. Senate Intelligence Committee staff of Sen. Dianne Feinstein (D-CA).

Jones led the Senate Intelligence Committee staff team behind the creation of the “Senate Torture Report,” which publicized CIA detention and interrogation practices during the War on Terror. [7] Many of the report’s findings were disputed by the CIA and other intelligence agencies, and its release was controversial because of the value the information it contained could potentially provide to terrorist organizations and other enemies of the United States. [8]

The report was published in December 2014 by the Senate’s Democratic leadership as one of their last actions before a Republican majority took control in 2015. In doing so, the Senate rejected a request from [Obama administration](#) Secretary of State John Kerry to delay the release out of concerns it would harm diplomatic efforts to build an international coalition against the ISIS Islamist terrorist network. [9]

Alka Pradhan, an attorney defending accused 9/11 terrorist attack planner Ammar al-Baluchi, has said that she will “forever be grateful” to Jones for the information released in the Torture Report. [10] [11] She said the information regarding CIA practices was “gold” for al-Baluchi’s defense. [12]

The government charged Al-Baluchi (born Abd Al Aziz Ali) with allegedly managing the travel plans and finances that delivered at least 13 of the 9/11 hijackers to the U.S., as well as later acting as a courier for Al Qaeda terrorist organization leader Osama bin Laden. [13]

#### *The Report (Film)*

The 2019 film *The Report* tells a fictionalized story of the creation of the torture report and positions Jones, as portrayed by actor Adam Driver, as a hero. [14] The film premiered at what the *Hollywood Reporter* characterized as a “politics-heavy” 2019 Sundance Film Festival, alongside movies celebrating U.S. Rep. Alexandria Ocasio-Cortez (D-N.Y) and “Dreamer” immigrants. [15]. The film was created by DNC Feinstein advocates.

Penn Quarter Group

After leaving the Senate, Jones spent a year working for the lobbying firm of former Senate

Majority Leader (and board chair of the [Center for American Progress](#) think tank) [Tom Daschle](#) (D-SD) before founding the Penn Quarter Group. [16]

According to a report by House Intelligence Committee Republicans, Jones described Penn Quarter to the FBI in 2017 as “exposing foreign influence in Western elections,” and told FBI agents that it “was being funded by 7 to 10 wealthy donors located primarily in New York and California, who provided approximately \$50 million.” [17]

According to Senator Charles Grassley (R-IA), Jones told the FBI that Penn Quarter had secured the services of Christopher Steele and controversial opposition research firm Fusion GPS to “continue exposing Russian interference in the 2016 U.S. Presidential election.” Grassley alleged that Jones planned to send information generated by Steele and Fusion GPS to Congress and the media. [18]

In sworn testimony, former Trump campaign aide Michael Caputo would later accuse Penn Quarter of feeding false information to Jones’s former Senate Intelligence Committee colleagues, claiming that the resulting investigations forced Caputo to incur significant legal bills and receive death threats to himself and his family, even though Caputo was never charged with any wrongdoing. [19]

Even after the Mueller Report found no evidence that the Trump campaign engaged in any criminal conspiracy with Russian interests, Jones continued to promote theories regarding the 2016 election to national media based on information allegedly uncovered by his researchers at Penn Quarter. [20][21]

#### Democracy Integrity Project

*For more information, see [Democracy Integrity Project](#) (Nonprofit)*

In 2017, Jones founded the [Democracy Integrity Project](#) as a 501(c)(4) advocacy group. [22] Funded by a range of left-wing donors, including liberal financier [George Soros](#), the organization promotes left-wing narratives around foreign interference in the 2016 U.S. presidential election and other elections around the world. [23] A spokesperson for Soros confirmed to the *Washington Post* that the Democracy Integrity Project “used Fusion GPS as a contractor.” [24]

In its 2018 tax filings, the Democracy Integrity Project reported paying more than \$3.3

1 million to Fusion GPS's parent company Bean LLC and more than \$250,000 to a UK-based  
 2 company at which Christopher Steele is a director for "research consulting." [25] [26] [27] It also  
 3 paid almost \$150,000 to Istok Associates, a UK-based firm run by Neil Barnett, who claims that  
 4 Russia interfered with the UK's Brexit election. [28][29]

#### 5 Advance Democracy

6 In January 2018, Jones also launched Advance Democracy, a 501(c)(3) charity. [30] This  
 7 organization has not yet publicly filed any financial reports, but is also active in alleging continued  
 8 Russian election interference: The *New York Times* reported that it had "flagged a number of  
 9 suspicious websites and social media accounts" to authorities as promoting Russian interference in  
 10 the 2019 European Parliament elections. [31]

#### 11 References

12 1. Jones, Daniel J. "Profile: Daniel J. Jones." LinkedIn. Accessed June 10, 2019.

13 <https://www.linkedin.com/in/danieljjones/>. ^

14 2. Grassley, Charles E. "Letter from Sen. Charles Grassley to Sen. Christopher Coons."  
 15 United States Senate. May 29, 2018. Accessed May 23, 2019.

16 [https://www.judiciary.senate.gov/imo/media/doc/2018-05-29%20CEG%20to%20Coons](https://www.judiciary.senate.gov/imo/media/doc/2018-05-29%20CEG%20to%20Coons%20(Trump%20Jr%20Interview).pdf)  
 17 [%20\(Trump%20Jr%20Interview\).pdf](https://www.judiciary.senate.gov/imo/media/doc/2018-05-29%20CEG%20to%20Coons%20(Trump%20Jr%20Interview).pdf). ^

18 3. Polantz, Katelyn. "Steele Says He Used Unverified Information to Support Details  
 19 about Web Company in Dossier." CNN. March 16, 2019. Accessed May 23, 2019.

20 <https://www.cnn.com/2019/03/16/politics/steele-information-dossier/index.html>. ^

21 4. "Congressional Record." Congressional Record S8374-1. December 3, 2015.

22 Accessed May 23, 2019. [https://www.congress.gov/congressional-record/2015/12/03/senate-](https://www.congress.gov/congressional-record/2015/12/03/senate-section/article/S8374-1)  
 23 [section/article/S8374-1](https://www.congress.gov/congressional-record/2015/12/03/senate-section/article/S8374-1). ^

24 5. Jones, Daniel J. "Profile: Daniel J. Jones." LinkedIn. Accessed May 23, 2019.

25 <https://www.linkedin.com/in/danieljjones/>. ^

26 6. Bach, Deborah. "Regular Guy Becomes Most Eligible." Baltimore Sun. December  
 27 09, 2018. Accessed May 23, 2019. [https://www.baltimoresun.com/news/bs-xpm-2000-07-](https://www.baltimoresun.com/news/bs-xpm-2000-07-03-0007030010-story.html)

28 [03-0007030010-story.html](https://www.baltimoresun.com/news/bs-xpm-2000-07-03-0007030010-story.html). ^

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1 7. “Daniel J. Jones.” The Carr Center for Human Rights – Harvard Kennedy School.  
2 Accessed May 14, 2019. <https://carrcenter.hks.harvard.edu/people/daniel-jones>. ^

3 8. Brennan, John O. “CIA Comments on the Senate Select Committee on Intelligence  
4 Report on the Rendition, Detention, and Interrogation Program.” Central Intelligence  
5 Agency. July 27, 2013. Accessed May 28, 2019.  
6 [https://www.cia.gov/library/reports/CIAs\\_June2013\\_Response\\_to\\_the\\_SSCI\\_Study\\_on\\_the](https://www.cia.gov/library/reports/CIAs_June2013_Response_to_the_SSCI_Study_on_the_Former_Detention_and_Interrogation_Program.pdf)  
7 [Former Detention and Interrogation Program.pdf](https://www.cia.gov/library/reports/CIAs_June2013_Response_to_the_SSCI_Study_on_the_Former_Detention_and_Interrogation_Program.pdf). ^

8 9. Ackerman, Spencer. “‘A Constitutional Crisis’: The CIA Turns on the Senate.” The  
9 Guardian. September 10, 2016. Accessed May 23, 2019. [https://www.theguardian.com/us-](https://www.theguardian.com/us-news/2016/sep/10/cia-senate-investigation-constitutional-crisis-daniel-jones)  
10 [news/2016/sep/10/cia-senate-investigation-constitutional-crisis-daniel-jones](https://www.theguardian.com/us-news/2016/sep/10/cia-senate-investigation-constitutional-crisis-daniel-jones). ^

11 10. “Alka Pradhan.” Penn Law. Accessed May 14, 2019.  
12 <https://www.law.upenn.edu/cf/faculty/pradhana/>. ^

13 11. “Abd Al Aziz Ali – The Guantánamo Docket.” The New York Times. Accessed May  
14 14, 2019. [https://www.nytimes.com/interactive/projects/guantanamo/detainees/10018-abd-](https://www.nytimes.com/interactive/projects/guantanamo/detainees/10018-abd-al-aziz-ali)  
15 [al-aziz-ali](https://www.nytimes.com/interactive/projects/guantanamo/detainees/10018-abd-al-aziz-ali). ^

16 12. Alka Pradhan. “I Will Forever Be Grateful to @DanielJJonesUS and the SSCI Staff;  
17 That Chart Is \*gold\*.” Twitter. March 05, 2019. Accessed May 14, 2019.  
18 <https://twitter.com/PradhanAlka/status/1102750743864504320>. ^

19 13. Savage, Charlie. “Judge Bars Statements Made by Guantánamo Detainees During  
20 F.B.I. Interrogations.” The New York Times. August 18, 2018. Accessed May 23, 2019.  
21 [https://www.nytimes.com/2018/08/17/us/politics/guantanamo-detainees-fbi-](https://www.nytimes.com/2018/08/17/us/politics/guantanamo-detainees-fbi-interrogations.html)  
22 [interrogations.html](https://www.nytimes.com/2018/08/17/us/politics/guantanamo-detainees-fbi-interrogations.html). ^

23 14. “The Report.” Internet Movie Database. January 26, 2019. Accessed May 23, 2019.  
24 <https://www.imdb.com/title/tt8236336/>. ^

25 15. Siegel, Tatiana. “Sundance Unveils Politics-Heavy Lineup Featuring Ocasio-Cortez  
26 Doc, Feinstein Drama.” The Hollywood Reporter. December 12, 2018. Accessed May 23,  
27 2019. [https://www.hollywoodreporter.com/news/alexandria-ocasio-cortez-doc-dianne-](https://www.hollywoodreporter.com/news/alexandria-ocasio-cortez-doc-dianne-feinstein-drama-sundance-2019-lineup-1164468)  
28 [feinstein-drama-sundance-2019-lineup-1164468](https://www.hollywoodreporter.com/news/alexandria-ocasio-cortez-doc-dianne-feinstein-drama-sundance-2019-lineup-1164468). ^

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16. "People on the Move." Washington Business Journal. December 16, 2016. Accessed May 29, 2019. [https://www.bizjournals.com/washington/potmsearch/detail/submission/5362232/Daniel\\_Jones](https://www.bizjournals.com/washington/potmsearch/detail/submission/5362232/Daniel_Jones). <sup>^</sup>

17. "REPORT OF THE HOUSE PERMANENT SELECT COMMITTEE ON INTELLIGENCE ON RUSSIAN ACTIVE MEASURES Together with MINORITY VIEWS." (p.113) Congress.gov. December 31, 2018. Accessed May 23, 2019. <https://www.congress.gov/115/crpt/hrpt1110/CRPT-115hrpt1110.pdf>. <sup>^</sup>

18. Grassley, Charles E. "Letter from Sen. Charles Grassley to Sen. Christopher Coons." United States Senate. May 29, 2018. Accessed May 23, 2019. [https://www.judiciary.senate.gov/imo/media/doc/2018-05-29%20CEG%20to%20Coons%20\(Trump%20Jr%20Interview\).pdf](https://www.judiciary.senate.gov/imo/media/doc/2018-05-29%20CEG%20to%20Coons%20(Trump%20Jr%20Interview).pdf). <sup>^</sup>

19. Acosta, Jim, and Jeremy Herb. "Michael Caputo Slams Senate Intel Panel in Interview." CNN. May 02, 2018. Accessed May 23, 2019. <https://www.cnn.com/2018/05/01/politics/michael-caputo-senate-interview/index.html>. <sup>^</sup>

20. Lichtblau, Eric. "Donald Trump's Alfa Bank Connection Still Raises Questions." Time. May 21, 2019. Accessed May 23, 2019. <http://time.com/5592739/donald-trump-petr-aven-alfa-bank/>. <sup>^</sup>

21. Filkins, Dexter. "Was There a Connection Between a Russian Bank and the Trump Campaign?" The New Yorker. April 24, 2019. Accessed May 23, 2019. <https://www.newyorker.com/magazine/2018/10/15/was-there-a-connection-between-a-russian-bank-and-the-trump-campaign>. <sup>^</sup>

22. "DETERMINATION LETTER." Internal Revenue Service. August 29, 2017. Accessed May 23, 2019. [https://apps.irs.gov/pub/epostcard/dl/FinalLetter\\_81-5223488\\_THEDEMOCRACYINTEGRITYPROJECT\\_03172017\\_01.tif](https://apps.irs.gov/pub/epostcard/dl/FinalLetter_81-5223488_THEDEMOCRACYINTEGRITYPROJECT_03172017_01.tif). <sup>^</sup>

23. Solomon, John. "US Embassy Pressed Ukraine to Drop Probe of George Soros Group during 2016 Election." TheHill. March 26, 2019. Accessed May 23, 2019. <https://thehill.com/opinion/campaign/435906-us-embassy-pressed-ukraine-to-drop-probe-of-george-soros-group-during-2016>. <sup>^</sup>

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1 24.Ignatius, David. "The GOP's Spin on the Russia Probe Doesn't Add up." The  
2 Washington Post. September 25, 2018. Accessed May 23, 2019.  
3 [https://www.washingtonpost.com/opinions/a-gop-spin-on-the-russia-probe-reads-like-a-noir-](https://www.washingtonpost.com/opinions/a-gop-spin-on-the-russia-probe-reads-like-a-noir-thriller-but-doesnt-add-up/2018/09/25/1b940c92-c0ca-11e8-be77-516336a26305_story.html?utm_term=.32429e427000)  
4 [thriller-but-doesnt-add-up/2018/09/25/1b940c92-c0ca-11e8-be77-](https://www.washingtonpost.com/opinions/a-gop-spin-on-the-russia-probe-reads-like-a-noir-thriller-but-doesnt-add-up/2018/09/25/1b940c92-c0ca-11e8-be77-516336a26305_story.html?utm_term=.32429e427000)  
5 [516336a26305\\_story.html?utm\\_term=.32429e427000](https://www.washingtonpost.com/opinions/a-gop-spin-on-the-russia-probe-reads-like-a-noir-thriller-but-doesnt-add-up/2018/09/25/1b940c92-c0ca-11e8-be77-516336a26305_story.html?utm_term=.32429e427000). ^

6 25."Democracy Integrity Project, Form 990 – Nonprofit Explorer." ProPublica. May 09,  
7 2013. Accessed May 28, 2019.  
8 [https://projects.propublica.org/nonprofits/organizations/815223488/201843199349303694/](https://projects.propublica.org/nonprofits/organizations/815223488/201843199349303694/IRS990)  
9 [IRS990](https://projects.propublica.org/nonprofits/organizations/815223488/201843199349303694/IRS990). ^

10 26."People for WALSINGHAM PARTNERS LIMITED (09558344)."  
11 WALSINGHAM PARTNERS LIMITED – Officers (free Information from Companies  
12 House). Accessed May 28, 2019.  
13 <https://beta.companieshouse.gov.uk/company/09558344/officers>. ^

14 27.Gerstein, Josh, and Darren Samuelsohn. "Judge Won't Dismiss Libel Suit against  
15 Fusion GPS over Dossier." POLITICO. January 17, 2019. Accessed May 28, 2019.  
16 <https://www.politico.com/story/2019/01/17/libel-suit-fusion-gps-dossier-1106984>. ^

17 28.Barnett, Neil. "Russia's Brexit Subversion." The American Interest. November 09,  
18 2017. Accessed May 28, 2019. [https://www.the-american-interest.com/2017/11/09/russias-](https://www.the-american-interest.com/2017/11/09/russias-brexit-subversion/)  
19 [brexit-subversion/](https://www.the-american-interest.com/2017/11/09/russias-brexit-subversion/). ^

20 29."People for ISTOK ASSOCIATES LIMITED (07194978)." ISTOK ASSOCIATES  
21 LIMITED – Officers (free Information from Companies House). Accessed May 28, 2019.  
22 <https://beta.companieshouse.gov.uk/company/07194978/officers>. ^

23 30."Advance Democracy, Inc." Internal Revenue Service. Accessed May 28, 2019.  
24 [https://apps.irs.gov/app/eos/displayAll.do?](https://apps.irs.gov/app/eos/displayAll.do?dispatchMethod=displayAllInfo&Id=10904680&ein=824277642)  
25 [dispatchMethod=displayAllInfo&Id=10904680&ein=824277642](https://apps.irs.gov/app/eos/displayAll.do?dispatchMethod=displayAllInfo&Id=10904680&ein=824277642). ^

26 31.Apuzzo, Matt, and Adam Satariano. "Russia Is Targeting Europe's Elections. So Are  
27 Far-Right Copycats." The New York Times. May 12, 2019. Accessed May 23, 2019.  
28 <https://www.nytimes.com/2019/05/12/world/europe/russian-propaganda-influence->

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1 [campaign-european-elections-far-right.html](#). [^](#)

2

3 [Democracy Integrity Project \(TDIP\) \(Non-profit\)](#)

4

5 **Each of the other attackers has a detailed investigation report on them and an active**  
6 **surveillance action underway by either the FBI, DOJ, FINCen, FTC, SEC, GAO, Congress,**  
7 **Interpol and private investigators.**

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## EXHIBIT 18 - The Suspicious Deaths

This felony criminal investigation case, is documented on thousands of websites and in dozens of federal court case records in which Victim/Witnesses won the case or was vindicated in the case and in thousands of news websites. Victim/Witnessess researchers and investigators disagree with any decision by any agency which causes a delay in response which puts the Victim/Witnessess in jeopardy for their life and safety. Testifying, and/or reporting about this crime has resulted in the death, potentially by murder, of the following individuals who reported to the authorities about this crime matter. Because this case involves a huge number of deaths, spies, trillions of dollars of energy industry funds, hit-jobs and epic political dirty tricks contracts there is a warning in effect to every suspect on "the list". "If any other principle whistle-blower in this case is killed, within 24 hours of their death, every person on "the list" will experience the worst possible outcome!"

Any delay, obfuscation, cover-up, FOIA refusal or other obscuring tactic by each and every member of an agency employee or contracting entity will be prosecuted on a person-by-person basis. Each employee or official who causes, by their action, further harm to the Victim/Witnessess will be sued personally, have their assets garnished and will have a formal criminal referral authored and submitted to the FBI, DOJ, FTC, Congress and the news media. Victim/Witnessess have sued the highest level personnel in the government for corruption, launched FBI and Congressional investigations against them and had them removed from their jobs and placed under permanent surveillance. The court and news records prove this fact. Do not imagine that any reprisal action by a public agency staffer will go unnoticed or unpunished by federal law enforcement, public forensics and major independent news media investigations.

The fact remains that the following person's were whistle-blowers or innocent victims in this crime. They died via strange, suspicious and untimely circumstances. Some of them may have been

1 murdered for helping with this case. This is not a complete list.

2 The following people associated with this case as witnesses are dead and many seem to have  
3 been murdered as reprisal for talking about this case:

4 ***Rajeev Motwani; Gary D. Conley; Seth Rich; Philip Haney; David Bird; Doug Bourn;***  
5 ***Misti Epstein; Joshua Brown; Kenneth Bellando; Moritz Erhardt; Imran Aliev; Kate Matrosova;***  
6 ***David Drye; Vincent Foster; Kathy Ferguson; Duane Garrett; Eric S. Fox; Judi Gibbs; Berta***  
7 ***Caceres; Suzanne Coleman; L.J. Davis; John Hillyer; Stanley Huggins; Sandy Hume; Shawn***  
8 ***Lucas; Gary Johnson; John Jones; John F. Kennedy, Jr.; Stephen Ivens; Mary 'Caity'***  
9 ***Mahoney; Eric Butera; Danny Casolara; John Ashe; Tony Moser; Larry Nichols; Joseph Rago;***  
10 ***Ron Brown; Bob Simon; Don Adams; Peter Smith; Victor Thorn; Lori Klausutis; Gareth***  
11 ***Williams; Daphne Caruana Galizia; James D Johnston; Dave Goldberg; Loretta Fuddy; Paul***  
12 ***Wilcher; Gary Webb; Beranton J. Whisenant Jr; Stanley Meyer; Jon Parnell Walker; Tyler***  
13 ***Drumheller; Barnaby Jack; Dominic Di-Natale; Barbara Wise; Ilya Zhitomirskiy; Jeff Joe***  
14 ***Black; Robin Copeland; John Wheeler; Ashley Turton; Michael Hastings; Antonin Scalia;***  
15 ***David Koschman; David Werner; Alex Okrent; Kam Kuwata; Larry Frankel; And hundreds***  
16 **more connected to this case who suddenly, and strangely, turned up dead in this case and,**  
17 **ironically, their deaths all benefit the suspects in this case...**

18 **Rajeev Motwani** taught Google how to Google. Suddenly, in perfect health, he was found  
19 floating face-down, dead, in his Silicon Valley swimming pool. It helps certain people that he can  
20 no longer talk.

21  
22 **Gary D. Conley** was the CleanTech competitor to, and whistle-blower on, the suspects. He was  
23 suddenly found with a bullet in his head behind Beale Air Force base. It helps certain people that he  
24 can no longer talk.

25  
26 Google programmer **Forrest Hayes**, who worked on Google search engine rigging, was suddenly  
27 found dead with the story that “he was overdosed by a Google hooker on his sex yacht”.

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1 Google associate and Tesla Investments founder **Ravi Kumar** was also killed by his hooker.

2  
3 Deep Google investor VC liason and husband of Facebook executive **Cheryl Sandberg** was  
4 suddenly found dead with a hole in his head. The "official" story is that he was the first person in  
5 history to be killed by his treadmill.

6  
7 **David Bird** was the Wall Street Journal energy reporter who was working on a story that involved  
8 Cleantech energy connections of some of the suspects. He was working on a story about who  
9 controlled the modern energy industry and cleantech. He went for a walk and was found a long time  
10 later, dead, floating in a pond. It helps certain people that he can no longer talk.

11  
12 One **Mr. Breitbart** was a famous blogger, who railed on the web about the political manipulations  
13 of the suspects. Suddenly, he had a "heart attack" in his shower and died. It helps certain people that  
14 he can no longer talk on the blogs.

15  
16 Mr. **Karl Slym**, with Tata Motors was involved in a car deal with some of the suspects for one of  
17 the biggest Indian auto-makers. Suddenly he was a stain on the sidewalk, accomplished by his fall  
18 from the top of a skyscraper hotel. It helps certain people that he can no longer talk.

19  
20 **Doug Bourn**, The senior electrical engineer at Tesla (Google's covert partner), **Andrew Ingram** of  
21 Palo Alto, a top systems electrical engineer at Tesla; and **Brian M. Finn** the senior manager of  
22 interactive electronics, at Tesla, had deep knowledge of financial misdeeds and technical cover-ups  
23 at Tesla Motors. They were key parts of the Tesla operation. For some reason, they all got into a  
24 private airplane, in perfect health, and then the airplane plowed into the ground, killing all three at  
25 once. It helps certain people that they can no longer talk. They wrote, and helped describe, in Tesla's  
26 own federal patent filings, the fact that Tesla's batteries would kill you, maim you and/or burn your  
27 house down. Tesla did not realize this when they paid the federal patent filing fees. When Tesla,  
28 later realized this, they were forced to give all of their patents away for free. These three senior

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1 engineers had deep inside knowledge of the Tesla Motors operations. Their aircraft suffered an  
2 "Engineering failure".

3  
4 The above individuals had absolute knowledge of this case and some of them were known to have  
5 been whistle-blowers in this case.

6  
7 All of these people (now over 50+ people) were in top health, had lots of money and were not likely  
8 to have died when they did. Then they died, suddenly and suspiciously, under bizarre  
9 circumstances. They were all connected to the suspects. Over 50 investment bankers connected to  
10 the suspects and their Goldman Sach's finance group are also suddenly dead under bizarre  
11 circumstances.

12 The tactics that The U.S. Government and Obama White House staff have practiced, so far,  
13 are to LIE, DENY, DEFLECT, DELETE and DIVERT. History has proven that those tactics didn't  
14 work for them. Now it is time for GOVT to pay the damages.

**EXHIBIT 19 - The Tech Cartel**

The Silicon Valley Mafia is The Sandhill Road Venture Capital frat boy company bosses in Palo Alto, their National Venture Capital Association (NVCA) partners and the tech companies (Google, Tesla, Facebook, Amazon, Twitter, Linkedin, etc.) they control. They are sometimes referred to as The Deep State. They have purchased California, New York and Washington, DC politicians (mostly Senators) who they also control.

They hire rogue ex-intelligence agents to operate attacks via Fusion GPS, The Gawker/Gizmodo/Jalopnik/Univision Hatchet-Job Fake Tabloid Facade (ie: Obama had White House staff: Robert Gibbs and John Podesta hire them, in association with Obama financier Elon Musk, to attack WITNESS Vehicles, Bright Automotive and ZAP Vehicles as retribution in violation of anti-trust laws), Black Cube, ShareBlue, New America, In-Q-Tel, Podesta Group, Media Matters, etc. . They spend over \$30M on each massive media attack program against competitors, reporters and outsiders.

They collude on black-lists, valuation controls, election manipulation, search engine rigging, domestic spying for political manipulation, stock rigging, insider trading, executive prostitute clubs, trophy wife assignments, the bribery of politicians and worse. They are felons who pay politicians to halt investigations and interdiction efforts. They are widely covered in news media articles as: sex abusers, cult enthusiasts, elitists, rapists, woman beaters, sexual work extortion operators, extremists, arrogant clones of each other, tone deaf, echo-chamber reinforcing, misogynist, racist, manipulative, insecure, covertly gay, corrupt, thieves' and other anti-social revelations.

The divorce and sex abuse court filings against the #PaloAltoMafia men of Silicon Valley are some of the most disturbing and sexually twisted court records you will ever read and they demonstrate a clear and decades-long pattern of collusion and depravity. From Google's "Sex Slaves" to "Sex Penthouses" to "Deaths by Prostitute"; the list is endless.

They are not limited to California and also operate out of New York and Washington DC. They use their monopolistic control of the internet to massively and exclusively scale services that only they control and use to abuse public privacy, human rights, invention rights and information.

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1 They run their cartel like the old Italian Mafia once did.

2 Silicon Valley's Corrupt Palo Alto Mafia Network is based on "Scaled Monopolies" and  
3 covet Senate collusion ownerships of their companies.

4 The run a crime with hookers and a very big shark. Let us explain: There are millions of  
5 sharks in the ocean but only "Jaws" was big enough to earn himself (The Shark) so many feature  
6 films about trying to kill him. It was simply because he was so big and so hungry. Judging by the  
7 endless sequels, Jaws seems pretty hard to kill.

8 This is about the biggest sharks. They are from Silicon Valley.

9 Google, Facebook, Amazon, LinkedIn, Netflix, et al; exist because they operate under the  
10 criminal umbrella of the tech Cartel frat boys.

11 These guys are addicted to sex, and they are also huge assholes, so they can't keep any  
12 partners around unless they pay them to be trophy wives or "beard" wives. Buying sex from Italian  
13 escorts, young girls and New York Rent Boys is really, really expensive. This drives them to do  
14 anything to suck up huge amounts of cash.

15 These guys are also addicted to power, so they buy East and West Coast U.S. Senators,  
16 British Parliament members and partner with corrupt Russian oligarchs. Buying Senators is also  
17 really, really expensive. This also drives them to do anything to suck up huge amounts of cash.

18 These guys need, and spend, massive amounts of cash. Being a tech oligarch is really, really  
19 expensive. They can't have the IRS cutting into their hooker-budgets. They spend massive amounts  
20 on big law firms to hide money in real estate, trusts, fake charities and in a huge array of off-shore  
21 spider holes.

22 These guys can't afford to get caught so they hire In-Q-Tel, Gawker Media, Black Cube,  
23 Fusion-GPS, and a huge army of other attackers, to destroy anybody who questions their motives.  
24 Their Cartel exists because they own all of the main servers, banks, venture capital firms, tech law  
25 firms, K Street lobbyists and tech HR firms.

26 They control their entire eco-system and black-list anybody that offends them.

27 They own the internet and they delete anybody who steps in their circle.

28 Nobody can operate outside of it.

1 No start-up can compete with them without getting a hit-job put on it.

2 Since the year 2000, together, they have put over a million smaller companies out of  
3 business.

4 They exist because of "Scaling": the ability to use monopolized networks to reach everyone  
5 on Earth, have lower prices, and destroy all competition because they control all infrastructure.  
6 Scaling is all they talk about at their AngelGate "power lunches" in the back rooms of Restaurants  
7 on University Avenue in Palo Alto.

8 The FBI can't stop them because they owned James Comey, the head of the FBI.

9 The SEC, FEC and FTC can't stop them because they own the regulators at those agencies.

10 They Obama White House could not stop them because most of the Obama Administration  
11 was staffed by, and directed by, the staff of Google, Amazon and Facebook, et al.

12 Per the report at: [https://news.yahoo.com/coming-electric-car-disruption-nobody-](https://news.yahoo.com/coming-electric-car-disruption-nobody-134511726.html)  
13 [134511726.html](https://news.yahoo.com/coming-electric-car-disruption-nobody-134511726.html)

14 you can see that the steel industry and other "Cartels" will go to great lengths to prevent electric  
15 cars, like Plaintiffs, built, from coming to market, or from coming to market without Elon Musk's  
16 insiders.

17 The Silicon Valley tech Cartel makes the Mafia look like small potatoes.

18 ***They are a criminal organization!***

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## **EXHIBIT 20 – The Political Bosses Of This Cartel Enterprise**

If FINCEN, The FBI, ICIJ or our forensic team traces the ownerships, emails, stock brokers, family trusts, political contributions, operatives, lobbyists, bank accounts and communications and related forensic data between the perpetrators, it is obvious, to anyone with even a high-school education, that the perpetrators have conspired to engage in felony-grade crimes. AI-based, manual XKEYSCORE-class searches and ICIJ leaks have determined that the key management of this scheme included:

### **Felony Charges Against The Key Suspects Under RICO**

**Defendants and their Cartel operatives engaged in election law violating campaign finance, money laundering, illicit political quid pro quo and anti-trust violating operations, among other crimes.**

**Every public official who attacked Plaintiffs: A.) held stock and assets in Plaintiffs competitors, B.) was compensated by Plaintiffs competitors, C.) was a member of organizations who paid news, internet and information services to manipulate their output for their own unjust gain, D.) knew that their malicious assertions were false and defamatory, and E.) and otherwise met the legal means test to qualify as violators of federal RICO laws, Human Rights laws, Civil Rights standards and related State and Federal Constitutional rights laws.**

By rigging HUD, SSA, DOE, and other public benefits determinations, to harm the funding, payments, witness fees, informant fees, whistle-blower awards and stock market profits of adversaries, the Defendants engaged in felony crime. The purpose of this case is to cripple the whole crime organization via numerous charges, which shall be brought against multiple defendants, under multiple liability, which means that prosecutors will find the underlying elements

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1 of of these acts and then have conspiracy on top of it, and then each and *every charge* against the  
2 perpetrators is *separate* and runs *consecutively* .

3 These RICO-related charges are easy to prove in court, as they focus on patterns of behavior  
4 as opposed to criminal acts. The government officials and their tech oligarch partners were  
5 audacious in publicly promoting their crimes and their above-the-law attitudes. RICO, here, also  
6 permits a private individual “*damaged in his business or property*” by a “*racketeer*” to file a civil  
7 suit. The government should, thus, join with Plaintiffs in this case.

8 The *Plaintiffs have proven* the existence of an “*enterprise*”.

9 The defendant(s) are *not* the enterprise; in other words, the *defendant(s)* and the *enterprise*  
10 are *not* one and the same.

11 The defendant(s) meet the construct of four specified relationships:

12 1. the defendant(s) and the enterprise: either the defendant(s) invested the proceeds of the  
13 pattern of racketeering activity into the enterprise;

14 2. the defendant(s) acquired or maintained an interest in, or control of, the enterprise through  
15 the pattern of racketeering activity;

16 3. the defendant(s) conducted or participated in the affairs of the enterprise “through” the  
17 pattern of racketeering activity ;

18 4. the defendant(s) conspired to do all of the above crimes.

19 The enterprise, herein, is the ‘prize,’ ‘instrument,’ ‘victim,’ or ‘perpetrator’ of the  
20 racketeers. A civil RICO action for this matter should be filed in state *AND* federal court.

21 We intend that both the *criminal* and *civil* components will allow the recovery of treble  
22 damages (damages in *triple* the amount of actual/compensatory damages) for Plaintiffs.

23 Our evidence has focused on *patterns of behavior AND criminal acts*.

24 We seek multiple liability (charges brought against multiple defendants, which means if  
25 prosecutors now find the underlying elements of of these acts, you have conspiracy on top of it)

26 Each and *every charge* against defendants is *separate* and runs *consecutively*. *Admissible*  
27 hearsay evidence is offered in this case. Associative evidence is allowed ( *guilt by association*  
28 meaning if a defendant profited off the crimes of an organization even if he was not directly

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involved with the crime himself he shall still be charged as a co-conspirator and go *all the way* up the chain of command).

This case structure will incentivize the operatives (soldati) at the corrupt law firms, CPA's, lobbyists and media outlets to flip, or roll-over, on the bosses.

These racketeers must *forfeit all* ill-gotten gains and interest in any business gained through a pattern of "*racketeering activity*." Over 1000 false-front shells, trusts, dark money and PAC assets are known to be held by the defendants.

**These are the top corrupt parties** (*the worst of the bunch*) of the Cartel '*Enterprise*' that engaged in these crimes and/or acted as compensated operatives for the command and control of these attacks on citizens and abuses of government. Every person listed below now has a case file, and/or an active investigation underway by our investigators and/or The FBI, The SEC, The GAO, FINCEN, Interpol, ICIJ, The FTC and/or many other law enforcement and regulatory entities -

Eric Schmidt

Elon Musk

Mark Zuckerberg

Cheryl Sandberg

Larry Page

Sergy Brin

Vinod Khosla

Brian Goncher

Bruce Demming

John Doerr

Steve Spinner

Steve Westly

Steven Chu

Richard Blum

Paul Pelosi

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1 David Axelrod

2 Jay Carney

3 Eric Holder

4 John Podesta

5 And those associates named below who supported their command and control of the actions herein  
6 charged;

7  
8 Plaintiffs personally witnessed many of them do these crimes. An AI surveillance and  
9 monitoring dossier, on each of them, is updated weekly and every additional illicit deed they engage  
10 in is reported to authorities:

11 (- **A.J. Delaurio** – Defamation-for-sale blogger \*\*)(- **Abound Solar** - Criminally corrupt  
12 crony campaign finance front operation. (Terminated)(- **Adam Dachis** – Defamation-for-sale  
13 blogger)(- **Adam Weinstein** – Defamation-for-sale blogger)(- **Adrian Covert** – Defamation-for-  
14 sale blogger \*\*)(- **Adrien Chen** – Defamation-for-sale blogger)(- **Al Mottur and Manuel Ortiz,**  
15 **Brownstein Hyatt Farber Schreck** \*\*)(- **Alan Henry** – Defamation-for-sale blogger)(- **Albert**  
16 **Burneko** – Defamation-for-sale blogger)(- **Alex Balk** – Defamation-for-sale blogger)(- **Alexander**  
17 **Pareene** – Defamation-for-sale blogger)(- **Alexandra Philippides** – Defamation-for-sale blogger)  
18 (- **Allison Spinner** – Wife of Steve Spinner and lawyer at WSGR and Solyndra who helped  
19 Feinstein rig the Solyndra cash ((Under investigation. All assets being tracked and terminated. \*\*))(-  
20 **Allison Wentz** – Defamation-for-sale blogger)(- **Alphabet** - Privacy abuse, spy-on-the-public, Fake  
21 News election rigger, Clinton/DNC scheme financier, Possible Rogue spy agency operation (Under  
22 Federal and EU investigation) \*\*)(- **Andrew Collins** – Defamation-for-sale blogger)(- **Andrew**  
23 **Magary** – Defamation-for-sale blogger)(- **Andrew McCormack**)(- **Andrew Orin** – Defamation-  
24 for-sale blogger)(- **Andy Barbour, Smith-Free Group** \*\*)(- **Andy Bechtolsheim** – VC, Tech  
25 Manipulator- \*\*)(- **Aneesh Chopra**)(- **Angelica Alzona** – Defamation-for-sale blogger)(- **Anna**  
26 **Merlan** – Defamation-for-sale blogger)(- **Ariana Cohen** – Defamation-for-sale blogger)(- **Arnold**  
27 **Schwarzenegger** – Governor (Accused of political bribery and kickbacks; tax evasion, illicit deal  
28 organization with Russians And Silicon Valley VC's and more...)(- **Ashley Feinberg** –

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1 Defamation-for-sale blogger)(- Austin Lau)(- Ava Gyurina – Defamation-for-sale blogger)(-  
 2 Barack Obama – Chicago politician and director of the tech mob bundlers \*\*)(- Barry Petchesky  
 3 – Defamation-for-sale blogger)(- Bill Daley – White House strong-arm (Forced to resign)(he is now  
 4 under investigation) \*\*)(- Bill Gurley)(- Bill Lockyer – Calif State finance head (Under  
 5 investigation and sex scandal conflicts, charged with corruption by media. Assets and ownerships  
 6 under investigation \*\*)(- Brendan I. Koerner – Defamation-for-sale blogger)(- Brendan  
 7 O'Connor – Defamation-for-sale blogger)(- Brent Rose – Defamation-for-sale blogger)(- Brian  
 8 Goncher – Deloitte VC intermediary in the stock market rigging (He is now under investigation)  
 9 (accused of political bribery and kickbacks; tax evasion, and more... \*\*)(- Brian Hickey –  
 10 Defamation-for-sale blogger)(- Brobeck Law Firm - Corrupt insiders for crony deals (Terminated)(-  
 11 Camila Cabrer – Defamation-for-sale blogger)(- Carl Gordon)(- Chad Hurley)(- Cheryl  
 12 Sandberg – Facebook boss, reports to Larry Summers \*\*)(- Choire Sicha – Defamation-for-sale  
 13 blogger)(- Chris Jennings, Jennings Policy Strategies \*\*)(- Chris Mohnney – Defamation-for-sale  
 14 blogger)(- Chuck Brain, Capitol Hill Strategies Inc. \*\*)(- Civis Analytics – Social manipulation  
 15 group \*\*)(- Clover Hope – Defamation-for-sale blogger)(- Covington & Burling - Corrupt legal  
 16 manipulations group \*\*)(- Dan Tate Jr., Capitol Solutions)(- Daniel Cohen – GOVT Legal  
 17 counsel who assisted in the Steven Chu scam (Sent packing/fired/forced to resign \*\*)(- Daniel  
 18 Morgan – Defamation-for-sale blogger)(- Dark Money Group relay inside Google/Alphabet \*\*)  
 19 (- David Axelrod – White House strategist who helped stage the quid-pro-quo (Sent  
 20 packing/fired/forced to resign)(he is now under investigation)(accused of political bribery and  
 21 kickbacks; tax evasion, and more... \*\*)(- David Castagnetti \*\*)(- David Danielson)(- David  
 22 Drummond – Lawyer/Lobbyist– Google, bribes expert for DC and EU regions. Cheated on wife  
 23 with Google employees. (Under investigation. Quail Road, Woodside, CA home bugged) \*\*)(-  
 24 David Matthews – Defamation-for-sale blogger)(- David Mott)(- David Plouffe – White House  
 25 money packager. Arranged deals between VC campaign Donors; caught bribing Rahm Emanuel  
 26 (Forced to Resign. Under investigation) \*\*)(- David Prend)(- David Sacks)(- David Sandalow \*\*)  
 27 (- Debbie Wasserman Schultz \*\*)(- Denis McDonough – White House adviser \*\*)(- Diana  
 28 Moskovitz – Defamation-for-sale blogger)(- Dianne Feinstein – California politician with the

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largest corruption charges, Chinese spies and a huge hit-job operatives group. Tens of millions of dollars of stock market payola have passed through her family stock accounts **\*\*)(- Draper - Fisher** – VC firm (Campaign funder who received massive windfalls from Russian mining & Tesla start-up rigging) **\*\*)(- Eleanor Shechet** – Defamation-for-sale blogger)(- **Elizabeth Spiers** – Defamation-for-sale blogger **\*\*)(- Elizabeth Starkey** – Defamation-for-sale blogger)(- **Elon Musk** – CEO – Tesla (He is now under investigation & in multiple lawsuits for fraud)(accused of political bribery and kickbacks; tax evasion, and more...All of his personal assets, investments and portfolio holdings are under investigation **\*\*)(- Emanuel Rouvelas, K&L Gates** **\*\*)(- Emily Gould** – Defamation-for-sale blogger)(- **Emily Herzig** – Defamation-for-sale blogger)(- **Emma Carmichael** – Defamation-for-sale blogger)(- **Eric Holder** – Attorney General- DOJ (Forced to resign) - Placed in office by Covington & Burling, (Charged with staff & VC Protections and blockade of FBI and Special Prosecutor deployments in order to run the cover-up) **\*\*)(- Eric Paley)(- Eric Schmidt** – Owner- Google (He is now under investigation)(accused of political bribery, sex addiction abuse and kickbacks; tax evasion, and more...**\*\*)(- Eric Strickland** – Head of Auto Safety agency under DOT (Sent packing/fired/forced to resign)(he is now under investigation. Charged with cover-up of Tesla and GM auto dangers he had known about **\*\*)(- Erin Ryan – Defamation-for-sale blogger)** (- **Ethan Sommer** – Defamation-for-sale blogger)(- **Eyal Ebel** – Defamation-for-sale blogger)(- **Facebook** - Privacy abuse, spy-on-the-public, Fake News election rigger, Clinton/DNC scheme financier ( Failing, rapidly decreasing users and increasing fake ad stats disclosures **\*\*)(- Fisker** - Criminally corrupt crony campaign finance front operation. (Terminated)(- **Fred Graefe, Law Offices of Frederick H. Graefe** **\*\*)(- Fusion GPS** – Defamation and journalist bribery service **\*\*)(- Gabriel Burt)(- Gabrielle Bluestone** – Defamation-for-sale blogger)(- **Gabrielle Darbyshire** – Defamation-for-sale blogger and attack services director **\*\*)(- Gawker Media** – DNC/Clinton/Obama character assassination media tool (In Mid-Termination **\*\*)(- Georgina K. Faircloth** – Defamation-for-sale blogger)(- **Gerald Cassidy and Gregg Hartley, Cassidy & Associates** **\*\*)(- Gilman Louie** – VC, founder of IN-Q-Tel and corrupt NVCA finance black-lists **\*\*)(- Gizmodo Media** – DNC/Clinton/Obama character assassination media tool ( Failing, rapidly decreasing users and increasing fake ad stats disclosures **\*\*)(- Goldman Sachs** – Financial

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packager (Suspected of staging most of the TARP/GOVT deals for personal gain & insider payouts  
 \*\*)(- **Google, Inc.** – Data harvesting company(Ran media attacks, stock market pump and dump PR  
 hype and character assassinations)(accused of political bribery and kickbacks; tax evasion, and  
 more...) (charged by EU, and most nations, with multiple abuses of the public. Has totally lost the  
 trust of the public. Revenue loss increasing geometrically. \*\*)(- **Gregory Howard** – Defamation-  
 for-sale blogger)(- **Greylock Capital** – Silicon Valley Insider trading operator and covert  
 campaign financier (Under investigation \*\*)(- **Hamilton Nolan** – Defamation-for-sale blogger)(-  
**Hannah Keyser** – Defamation-for-sale blogger)(- **Harry Reid** – Senator- Solar factory guru,  
 Congress lead (Accused of political bribery and kickbacks; tax evasion, and more...Forced out of  
 Congress in shame \*\*)(- **Heather Deitrich** – Defamation-for-sale blogger \*\*)(- **Heather Podesta** -  
 Heather Podesta + Partners with her husband, Tony. \*\*)(- **Hillary Clinton** – Dynastic politician \*\*)  
 (- **Hudson Hongo** – Defamation-for-sale blogger)(- **Hugo Schwyzer** – Defamation-for-sale  
 blogger)(- **Hunter Slaton** – Defamation-for-sale blogger)(- **Ian Fette** – Defamation-for-sale  
 blogger and Google, Gawker, Jalopnik, Match, Gizmodo media assassin \*\*)(- **In-Q-Tel, Inc.** –  
 Rogue CIA off-shoot associated with Eric Schmidt, Google, Elon Musk and the Cartel leaders. Ran  
 “hit-jobs” on Silicon Valley VC adversaries and reporters (Sued, under investigation, exposed in  
 multiple documentaries, under investigation for Cocaine trafficking. Removal of charity status  
 demanded \*\*)(- **Ira Ehrenpreis** – VC Campaign backer (He is now under investigation)(accused of  
 political bribery and kickbacks; tax evasion, and more...) ( All of his personal assets, investments  
 and portfolio holdings are under investigation \*\*)(- **Irin Carmon** – Defamation-for-sale blogger)(-  
**Ivanpah Solar** - Criminally corrupt crony Google campaign finance front operation. (In failure  
 mode)(- **Jack Lew**)(- **Jack Quinn, Quinn Gillespie & Associates**)(- **Jacque Littlefield** – Army  
 tank private attack squad owner, VC, Dead)(- **Jalopnik** – Online defamation facade political  
 publication. Pretends to be about cars but is DNC hit job rag \*\*)(- **James Bronkema** – West Coast  
 Money Man for David Rockefeller and Feinstein financier (Dead)(- **James Brown Jr** – Obamacare  
 HHS Programming and Operations lead in California (Arrested for corruption)(- **James J. Cooke** –  
 Defamation-for-sale blogger)(- **James King** – Defamation-for-sale blogger)(- **Jared Cohen** –  
 Google boss, Israeli spy interface and international political manipulator - \*\*)(- **Jawed Karim**)(-



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1 **Jay Carney** – White House press lead, now media hit man for Amazon (Forced to resign) \*\*)(- **Jeff**  
2 **Berman and David Russell, Bryan Cave.** Berman, the former delegate counter for President  
3 Obama’s 2008 campaign \*\*)(- **Jeff Lieberman**)(- **Jeff Peck, Peck, Madigan, Jones & Stewart.**  
4 Once an aide to then-Sen. Joe Biden (D-Del.) on the Senate Judiciary Committee \*\*)(- **Jeffrey**  
5 **Zients** \*\*)(- **Jennifer Ouellette** – Defamation-for-sale blogger)(- **Jeremy Stoppelman**)(- **Jerry**  
6 **Brown** – California politician with stock market owner-ships in all of the perps companies \*\*)(-  
7 **Jesse Oxfeld** – Defamation-for-sale blogger)(- **Jessica Cohen** – Defamation-for-sale blogger)(-  
8 **Jesus Diaz** – Defamation-for-sale blogger)(- **Jillian Schulz** – Defamation-for-sale blogger)(- **Jim**  
9 **Blanchard and Ilia Rodriguez, DLA Piper.** Blanchard, a former Democratic governor of  
10 Michigan, and Rodriguez, an ex-lobbyist for the Center for American Progress \*\*)(- **Jim Breyer** –  
11 VC and CIA intermediary who staged the NVCA as a tech funding black-list org to control Silicon  
12 Valley \*\*)(- **Jim Goetz**)(- **Jimmy Ryan, Elmendorf | Ryan**)(- **Joanna Rothkopf** – Defamation-  
13 for-sale blogger)(- **Joe Lonsdale** – VC, famous for rape and abuse scandal and domestic spying via  
14 Palantir \*\*)(- **Joe Rhodes** – White House shill and manipulator \*\*)(- **Joel Johnson, The Glover**  
15 **Park Group.** The former aide to Sen. Tom Daschle (D-S.D.) \*\*)(- **Johanna Shelton** - Google's  
16 lobbyist \*\*)(- **John Cook** – Defamation-for-sale blogger and director of media assassins group \*\*)  
17 (- **John Doerr** – Owner – Kleiner Perkins. “Godfather” – Silicon Valley Cartel (He is now under  
18 investigation)(accused of political bribery and kickbacks; tax evasion, and more...)( All of his  
19 personal assets, investments and portfolio holdings are under investigation \*\*)(- **John Goudie** -  
20 Florida mob boss, Christopher Columbus party scammer (arrested)(- **John Herrman** – Defamation-  
21 for-sale blogger \*\*)(- **John Lindfors**)(- **John Podesta** – White House adviser and master  
22 manipulator to drive stock pump and dumps \*\*)(- **John Raffaelli, Capitol Counsel.** \*\*)(-  
23 **Jonathan Silver** – GOVT VC (Sent packing/fired/forced to resign)(he is now under investigation.  
24 Shamed in media for epic failures \*\*)(- **Jordan Sargent** – Defamation-for-sale blogger)(- **Joseph**  
25 **Keenan Trotter** – Defamation-for-sale blogger)(- **Josh Ackil and Matt Tanielian, Franklin**  
26 **Square Group.** With clients including Apple, Google and Intel, the two Democrats are among the  
27 elite lobbyists for Silicon Valley in Washington. \*\*)(- **Josh Kopelman** \*\*)(- **Josh Stein** –  
28 Defamation-for-sale blogger)(- **Joshua Wright**)(- **JP Gan**)(- **Julia Allison** – Defamation-for-sale



1 blogger)(- **Julianne E. Shepherd** – Defamation-for-sale blogger)(- **Julie Domenick, Multiple**  
 2 **Strategies LLC**. Insider stock lobbyist \*\*)(- **Justin Hyde** – Defamation-for-sale blogger)(-  
 3 **Kamala Harris** – Crooked Senator directed by investment banker husband. Covered up death of  
 4 Gary Conley and Hastings the reporter \*\*)(- **Kate Dries** – Defamation-for-sale blogger)(-  
 5 **Katharine Trendacosta** – Defamation-for-sale blogger)(- **Katherine Drummond** – Defamation-  
 6 for-sale blogger)(- **Kathy Zoi** - Dept of Energy corruption suck up \*\*)(- **Keith Rabois** - Corrupt  
 7 VC \*\*)(- **Kelly Stout** – Defamation-for-sale blogger)(- **Ken Alex** – Political scheme adviser to  
 8 Jerry Brown \*\*)(- **Ken Duberstein and Marti Thomas, The Duberstein Group**. Duberstein was  
 9 floated as a candidate for Obama’s chief of staff before the president chose Bill Daley, while  
 10 Thomas is a Democratic vet who worked in the Clinton Treasury Department. \*\*)(- **Ken Howery** –  
 11 Corrupt VC \*\*)(- **Kenneth Kies, Federal Policy Group**)(- **Kerrie Uthoff** – Defamation-for-sale  
 12 blogger)(- **Kevin Draper** – Defamation-for-sale blogger)(- **Kleiner Perkins** – Campaign funding  
 13 VC who (Received massive windfalls from Russian mining & tech start-up rigging. Sued. Under  
 14 investigation. All assets being tracked \*\*)(- **Lacey Donohue** – Defamation-for-sale blogger)(-  
 15 **Lachlan Seward** – Energy Department gatekeeper, dirty schemes operator for Steven Chu \*\*)(-  
 16 **Larry O’Brien, OB-C Group**. O’Brien is one of the most potent Democratic fixers in the country  
 17 and has a personal connection to Fusion GPS and Google insider deals \*\*)(- **Larry Page** – Google  
 18 Boss, technology thief and covert political campaign financier \*\*)(- **Larry Summers** – VC and  
 19 Facebook covert boss to Sandberg \*\*)(- **Licy Do Canto, The DoCanto Group**)(- **Lisa**  
 20 **Kountoupes, Kountoupes Consulting**)(- **Lloyd Craig Blankfein** – VC and Sachs boss \*\*)(- **Lucy**  
 21 **Haller** – Defamation-for-sale blogger )( - **Luke Malone** – Defamation-for-sale blogger )( - **Luke**  
 22 **Nosek** )( - **Madeleine Davies** – Defamation-for-sale blogger )( - **Marc Andreessen** - Corrupt VC  
 23 and attack specialist \*\*)(- **Margaret Sullivan** – VC, USAID Boss, Tom Steyer’s partner and  
 24 Hillary Clinton best friend, intended Scty of State if Tom Steyer wins Presidency )( - **Mario Aguilar**  
 25 – Defamation-for-sale blogger )( - **Mario Rosatti** – VC and insider lawyer, covert political  
 26 campaign finance specialist \*\* )( - **Mark Isakowitz, Fierce, Isakowitz and Blalock** \*\* )( - **Mark**  
 27 **Kadesh**, Kadesh & Associates. Kadesh, once chief of staff to Sen. Dianne Feinstein (D-Calif.), has  
 28 an A-list of California Silicon Valley ANTIFA-like clients \*\* )( - **Mark Zuckerberg** – Sociopath

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1 Facebook Boss who has lied to Congress over and over \*\* )(- **Martin LaGod** - Firelake VC and  
 2 political manipulator \*\* )(- **Marty Paone, Prime Policy Group** \*\* )(- **Mary Meeker** – Corrupt  
 3 politicizing VC \*\* )(- **Matt Hardigree** – Defamation-for-sale blogger )(- **Matt Novak** –  
 4 Defamation-for-sale blogger )(- **Matt Rogers** – VC and pass-through conduit \*\* )(- **Max Levchin** -  
 5 Corrupt VC \*\* )(- **Mckinsey Consulting** – The firm you hire to rig white papers and insider hires  
 6 in government positions for the Palo Alto Mafia \*\* )(- **Megan Smith** )(- **Melissa Schulman, The**  
 7 **Bockorny Group** \*\* )(- **Michael Ballaban** – Defamation-for-sale blogger )(- **Michael Dobbs** –  
 8 Defamation-for-sale blogger )(- **Michael Eisenberg** )(- **Michael Moritz** - Corrupt VC )(- **Michael**  
 9 **Spinelli** – Defamation-for-sale blogger )(- **Mikey Dickerson** )(- **Mitch Feuer and Robert Griner,**  
 10 **Rich Feuer Group. Goldman Sachs lobbyist** \*\* )(- **Mohammed Nuru** - San Francisco Public  
 11 Works Boss, Arrested For Corruption, Sleeps with SF Mayor )(- **Morrison and Foerster** - Lawyers  
 12 to the corrupt Sandhill Road mob bosses\*\* )(- **Nancy Pelosi** – California politician with one of the  
 13 biggest stock market kick-back funds in America \*\* )(- **Nathan Parker** )(- **Neal Ungerleider** –  
 14 Defamation-for-sale blogger )(- **Neerag Agrawal** )(- **Nicholas Aster** – Defamation-for-sale blogger  
 15 )(- **Nicholas Guido Denton** – Defamation-for-sale blogger and head of the Gawker, Gizmodo,  
 16 Jalopnik sleaze tabloid empire and specialist in young boys \*\* )(- **Nick Allard, Thomas Hale**  
 17 **Boggs Jr., Micah Green, Jonathan Yarowsky and Edward Newberry, Patton Boggs** \*\* )(-  
 18 **Omar Kardoudi** – Defamation-for-sale blogger )(- **Owen Thomas** – Defamation-for-sale blogger )  
 19 (- **Patrick George** – Defamation-for-sale blogger, Soros shill and Character Assassination operative  
 20 \*\* )(- **Patrick Laffoon** – Defamation-for-sale blogger )(- **Patrick Redford** – Defamation-for-sale  
 21 **blogger** )(- **Perkins Coie** – Campaign cash conduit law firm \*\* )(- **Peter Fenton** )(- **Peter Thiel** –  
 22 Corrupt VC and Elon Musk boyfriend \*\* )(- **Pierre Omidyar** – Defamation-for-sale bloggers  
 23 financier and owner of Ebay \*\* )(- **Rahm Emanuel** – White House boss and corruption scheme  
 24 architect \*\* )(- **Raj Gupta** – McKinsey Associate And VC, (Arrested)(- **Rakesh Saxena** –  
 25 Canadian in-house arrest, arms dealer, western political packager (arrested)(- **Ray Lane** – Tax  
 26 Evading VC \*\* )(- **Reid Hoffman** – VC and sex.com partner with Gary Kremen and financier of  
 27 BLM riots \*\* )(- **Rich Gold, Kathryn Lehman and Gerry Sikorski, Holland & Knight** \*\* )(-  
 28 **Rich Juzwiak** – Defamation-for-sale blogger )(- **Richard Blakely** – Defamation-for-sale blogger )

1 (- **Richard Blum** – VC and director/husband of Dianne Feinstein \*\*) (- **Richard Rushfield** –  
2 Defamation-for-sale blogger) (- **Rick Kessler** - Dow Lohnes Government Strategies \*\*) (- **Robert**  
3 **Finger** – Defamation-for-sale blogger) (- **Robert Gibbs** – White press office head attack dog \*\*) (-  
4 **Robert Raben, The Raben Group** - Helped cover up Clinton crimes at DOJ \*\*) (- **Robert**  
5 **Sorokanich** – Defamation-for-sale blogger) (- **Robert Van Heuvelen, VH Strategies** \*\*) (- **Roelof**  
6 **Botha**) (- **Rory Waltzer** – Defamation-for-sale blogger) (- **Rosa Golijan** – Defamation-for-sale  
7 blogger) (- **Russel Simmons**) (- **Ryan Brown** – Defamation-for-sale blogger) (- **Ryan Goldberg** –  
8 Defamation-for-sale blogger) (- **Sam Faulkner Biddle** – Defamation-for-sale blogger, Runs a large  
9 part of the Antifa blog programs \*\*) (- **Sam Woolley** – Defamation-for-sale blogger) (- **Samar**  
10 **Kalaf** – Defamation-for-sale blogger) (- **Sander Lurie** - SNR Denton \*\*) (- **Sandi Stuart** - Clark  
11 **& Weinstock**) (- **Sanjay Wagle** – VC) (- **Sarah Ramey** – Defamation-for-sale blogger) (- **Scott**  
12 **Shleiffer**) (- **Sergy Brin** – Google boss, sex addict and oligarch \*\*) (- **Shannon Marie Donnelly** –  
13 Defamation-for-sale blogger) (- **Shep McAllister** – Defamation-for-sale blogger) (- **Solyndra Solar**  
14 **Company** – FBI raided corrupt Clean Tech company invested in by Feinstein family (terminated) (-  
15 **Sophie Kleeman** – Defamation-for-sale blogger) (- **SpaceX** – Elon Musk company that Obama  
16 gave part of NASA to in exchange for campaign conduits, most of their work is satellites that spy  
17 on the public \*\*) (- **Stephen Totilo** – Defamation-for-sale blogger) (- **Steve Chen**) (- **Steve**  
18 **Jurvetson** – VC embroiled in sex abuse charges and money laundering investigations \*\*) (- **Steve**  
19 **McBee, McBee Strategic** \*\*) (- **Steve Perry and Andy Wright, Dutko Grayling**) (- **Steve**  
20 **Rattner** – White House car czar, indicted for stock fraud \*\*) (- **Steve Spinner** – Energy  
21 Department manipulation expert, Wife was Solyndra’s lawyer \*\*) (- **Steve Westly** – VC \*\*) (-  
22 **Steven Chu** – Secretary of Energy – The most corrupt in US history \*\*) (- **Tamar Winberg** –  
23 Defamation-for-sale blogger) (- **Taryn Schweitzer** – Defamation-for-sale blogger) (- **Taylor**  
24 **McKnight** – Defamation-for-sale blogger) (- **Ted Schlein**) (- **Tesla Motors** – Car Company that is  
25 used to conduit money to political campaigns \*\*) (- **The Groundwork** – Social manipulation group  
26 ) (- **Thomas Jolly, Jolly/Rissler** \*\*) (- **Thorin Klosowski** – Defamation-for-sale blogger) (- **Tim**  
27 **Draper** – VC and Tesla stock manipulator \*\*) (- **Tim Marchman** – Defamation-for-sale blogger  
28 ) (- **Timothy Burke** – Defamation-for-sale blogger) (- **Tobey Grumet Segal** – Defamation-for-sale

1 **blogger )(- Todd Park – IT manipulator inside White House \*\* )(- Tom Ley – Defamation-for-**  
 2 **sale blogger )(- Tom O'Donnell, Gephardt Government Affairs Group \*\* )(- Tom Perkins –**  
 3 **KPCB Palo Alto Mafia founder (dead)( - Tom Scocca – Defamation-for-sale blogger )( - Tom**  
 4 **Sheridan, The Sheridan Group. \*\*)(Tom Steyer – VC obsessed with political manipulation and**  
 5 **Hillary financier \*\* )(- Tomorrow Ventures – Social manipulation group \*\* )(- Tony Podesta,**  
 6 **Podesta Group \*\* )(- Veronica de Souza – Defamation-for-sale blogger )(- Victor Fazio, Joel**  
 7 **Jankowsky, Scott Parven and Bill Paxon, Akin, Gump \*\* )(- Viktor Vekselberg – Russian**  
 8 **business entity who likes to meddle \*\* )( - Vinod Khosla - VC and political manipulator \*\* )(-**  
 9 **Wes Siler – Defamation-for-sale blogger )(- William Haisley – Defamation-for-sale blogger )( -**  
 10 **William Turton – Defamation-for-sale blogger )(- The Wilson Sonsini Insider Partner Staff**  
 11 **Club \*\* )(- Wilson, Sonsini, Goodrich and Rosatti \*\* )**

12       These parties, above, are the crooks under deep surveillance by the public and targeted for  
 13 100% legal termination and exposure. Federal agencies and citizen sleuths are asked to fully  
 14 prosecute them! San Francisco and Silicon Valley can't go bankrupt fast enough to make everyone  
 15 happy about the downfall of these corrupt empires! these people are the dark core of the entity  
 16 known as "*The Deep State*", aka, "*The Commission*", aka, "*The Silicon Valley Mafia*", aka "*The*  
 17 *Paypal Mafia*", et al.

18       Most of the people listed above paid and/or took bribes!

## **EXHIBIT 21 - Felony Charges Against affiliated insider Elon Musk**

Elon Musk is protected by President's, their White House staff, the financier's of those political campaigns and their banker: Goldman Sachs.

Elon Musk and his Cartel operatives engaged in election law violating campaign finance, money laundering, illicit political quid pro quo and anti-trust violating operations, among other crimes.

No competitor on Earth can go up against a business that: 1.) Get's exclusive favored-nations status from The White House, 2.) Get's exclusive cash from the government that nobody else can get, 3.) Get's federal investigation waivers and NHTSA enforcement avoidance, 4.) Has their stock market assets owned by the very politicians that are supposed to regulate their industry, 5.) Get's exclusive tax payment waivers, 6.) Get's exclusive fee waivers, 7.) Has almost no enforcement against it of the laws it violates, 8.) Has the majority of it's business dealings run by Goldman Sachs, 9.) Get's a federally financed monopoly.

When you peek behind the Wizard of Oz curtain in the magical fantasy technology world of Elon Musk you find that the entire emerald utopia is built out of bribes, payola and crony tech Illuminati stock market manipulations. Elon Musk's 'wizardry' is 20% other people's stolen technologies and 80% bullshit! He has purchased his internet PR facade with billions of dollars of the taxpayer's cash and keeps his self aggrandizing front going with extensive contracted off-shore troll farms and stock market "flash boy" algorithm computer hype engines.

Any tech person could do every single thing that Elon Musk has done with ONE THIRD LESS cash than Elon Musk has plowed through. So where does the rest of the money go?

It goes to political candidates in quid pro quo money laundering Dark Money conduits!

**Taxpayer money taken by Tesla Motors, which politicians own interest in and also get secret PAC money from:**

**\$3B**-CA Factory Subsidy

**\$1.3B**-NV tax incentive

**\$45M**-Discounted GOVT Loan

**\$90M**-CA Alternative energy advanced trans. financing authority

**\$517.2M**-Sale of CA and other regulatory credits

**\$284M**-Federal income Tax credits for consumers of Model S Sedan

**\$38M**-CA rebate for CA buyers of Model S Sedan

**\$126M**-CA Self Generation incentive program

**\$647,626**-CA job training reimbursement

Total Subsidy=**\$5,355,847,626 BILLION AND COUNTING**

**Taxpayer money taken by Elon Musk via SolarCity, which politicians own interest in and also get secret PAC money from:**

**\$750M**-NY State cost to build solar panel factory

**\$150M**- to start NY Factory Operation

**\$1.5B**-Est. value of 30% subsidy for solar installation since 2006, including at least **\$497M**- in Treasury grants

**\$5.6M**-OR tax credits & rebates

**\$260M**- NY local property tax exemptions

Total Subsidy=**\$3,163,100,000 BILLION AND COUNTING**

**Taxpayer money taken by Elon Musk via SpaceX, which politicians own interest in and also get secret PAC money from:**

1 **\$20M-** TX state & local incentives & rebates for space launch facility near Brownsville

2 **\$5.5B**– Government Contracts

3 **\$1.6B-** NASA space taxi contract

4 Total Subsidy= **\$7,120,000,000 BILLION AND COUNTING**

5  
6 **Know that everything you have seen in the main stream news media about Elon Musk**  
7 **was bought and placed there by Elon Musk. Elon Musk is a figment of his own propaganda,**  
8 **Chinese click farms, his hired troll “fan boys” and his sociopathy.**

9  
10 **A Question for Tesla’s Board: What Was Elon Musk’s Mental State?**

11 By James B. Stewart

12 Mr. Musk’s tweet last week — expressing his intent to take Tesla private and declaring that  
13 he had “funding secured” for the multi billion-dollar transaction — was so impulsive, potentially  
14 inaccurate, poorly worded and thought out, and with such potentially dire consequences for himself,  
15 Tesla and its shareholders, that the board now must ask a sensitive but vital question: What was Mr.  
16 Musk’s state of mind when he wrote it?

17 “What does this say about the judgment of the person who set all this in motion?” said  
18 Charles M. Elson, director of the Weinberg Center for Corporate Governance at the University of  
19 Delaware. “That’s what the board has to find out.”

20 Read the full article here

21 **Elon Musk needs to recognize his limitations and bring in a strong No. 2 to help run**  
22 **Tesla: Analysts**

23 Tesla co-founder and CEO Elon Musk must recognize he can’t do it all and agree to bring in  
24 a strong No. 2 to run day-to-day operations at the electric automaker, leading analysts told CNBC  
25 on Tuesday.

26 “We think he’s going through a founder’s dilemma. He’s clearly stretched too thin,”  
27 Consumer Edge Research analyst James Albertine said on “Squawk Box.” “I think this is Elon  
28 going through personal issues, having his own struggles with the bears, very publicly.”

1 Musk had been acting acting erratically for months even before his [take-private tweet two](#)  
2 [weeks ago](#), which raised concerns among investors and regulators in Washington.

3 In May, Musk rudely cut off analysts on Tesla's first-quarter earnings call, [something he](#)  
4 [apologized for](#) on the second-quarter call earlier this month. He was also launching tweetstorm after  
5 tweetstorm all summer long as he was dealing with major production problems for the automaker's  
6 new, less expensive sedan, the Model 3.

7 The board needs to bring in a chief operating officer or co-CEO to take some of the  
8 pressures off of Musk and allow him to concentrate on being a "brilliant leader as a visionary,"  
9 contended Albertine, who on Tuesday downgraded Tesla stock to equal weight and reduced his 12-  
10 month price target to \$311 per share from \$385.

11 Shares of Tesla broke a four-session, 14 percent losing streak on Monday, and the stock was  
12 logging a strong advance in early Tuesday trading.

13 Read more [here](#).

14  
15 **[After Elon Musk's 'Pedo' Tweet, Tesla Shares Fall 4% as Some Investors Worry](#)**  
16 **[About His Erratic Behavior](#)**

17 By KEVIN KELLEHER

18 Tesla's stock lost 4% of its value Monday following a rough weekend for its CEO Elon  
19 Musk.

20 Musk, who has taken to Twitter in recent weeks to combat his critics, drew criticism this  
21 weekend after calling a diver involved in the rescue of a Thai soccer team a "pedo." The diver, Vern  
22 Unsworth, had criticized Musk's effort to create a small submarine to rescue the soccer team  
23 members.

24 Thai rescuers succeeded in bringing the soccer team to safety without enlisting Musk's help.  
25 Unsworth dismissed it as a PR stunt, telling Musk he could "stick his submarine where it hurts."  
26 Musk then lashed back in a now deleted tweet that seemed to hint, by virtue of the British diver's  
27 residence in Thailand, that he was a pedophile.

28 Unsworth has said he is considering legal action against Musk, while Tesla investors wasted



1 no time in expressing their concerns about the CEO's erratic behavior. Tesla slid 2.8% during  
2 official market hours Monday, before declining more than 1% in after-hours trading.

3 Read the full post [here](#)

4 **[The many failures of Elon Musk, captured in one giant infographic](#)**

5 **[https://web.archive.org/web/20200104074824/https://stopelonfromfailingagain.com/](https://web.archive.org/web/20200104074824/https://stopelonfromfailingagain.com/2017/12/12/the-many-failures-of-elon-musk-captured-in-one-giant-infographic/)**  
6 **[2017/12/12/the-many-failures-of-elon-musk-captured-in-one-giant-infographic/](https://web.archive.org/web/20200104074824/https://stopelonfromfailingagain.com/2017/12/12/the-many-failures-of-elon-musk-captured-in-one-giant-infographic/)**

7 Among the more recent 'failures': parts of the Tesla Model 3 were being made by hand,  
8 contributing to a shortage of vehicles ready for delivery

9 Going through a rough patch at work? Well, at least you probably didn't get ousted as CEO of your  
10 own company, watch two of your companies hover on the brink of bankruptcy or get fired while on  
11 your honeymoon.

12 All of those things have happened at various points to Elon Musk, founder of SpaceX, co-  
13 founder of Tesla TSLA, -0.33% , founder of Neuralink, co-founder of SolarCity and co-founder of  
14 X.com which eventually became PayPal , and who now has a net worth of about \$15 billion.

15 Musk's impressive resume is littered with accomplishments, but it's worth remembering it's  
16 not all sunbeams and soaring stock prices.

17 Read the full post [here](#)

18 **[Sorry, But Tesla's Cool Electric Cars Can't Compete As Long As Fracking Exists](#)**

19 **[https://web.archive.org/web/20200104074824/https://stopelonfromfailingagain.com/](https://web.archive.org/web/20200104074824/https://stopelonfromfailingagain.com/2017/09/20/sorry-but-teslas-cool-electric-cars-cant-compete-as-long-as-fracking-exists/)**  
20 **[2017/09/20/sorry-but-teslas-cool-electric-cars-cant-compete-as-long-as-fracking-exists/](https://web.archive.org/web/20200104074824/https://stopelonfromfailingagain.com/2017/09/20/sorry-but-teslas-cool-electric-cars-cant-compete-as-long-as-fracking-exists/)**

21 If you were among the brave few who bought a Tesla Roadster in 2008, you purchased your  
22 government-subsidized \$100,000-plus electric car when a barrel of oil cost as much as \$162 in  
23 today's dollars. "Peak oil" was an article of faith — as crude supplies ran out, ever-higher oil prices  
24 would destroy demand for the internal combustion engine and other fossil-fuel monstrosities. But  
25 now, if you're one of the 500,000 wannabe Tesla owners who, according to CEO Elon Musk, has  
26 put down a \$1,000 deposit on a \$35,000 Model 3, the company's new mass-market electric sedan,  
27 you're probably just as familiar with a fashionable new green conceit. Now the article of faith is  
28 "peak demand" for oil, the idea that electric cars will soon make oil obsolete.

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You can read the full article [here](#).

[https://web.archive.org/web/20200104074824/http://www.investors.com/politics/  
commentary/sorry-but-teslas-cool-electric-cars-cant-compete-as-long-as-fracking-exists/](https://web.archive.org/web/20200104074824/http://www.investors.com/politics/commentary/sorry-but-teslas-cool-electric-cars-cant-compete-as-long-as-fracking-exists/)



[You must watch this Elon Musk video of rocket fails](https://web.archive.org/web/20200104074824/https://stopelonfromfailingagain.com/2017/09/19/you-must-watch-this-elon-musk-video-of-rocket-fails/)

<https://web.archive.org/web/20200104074824/https://stopelonfromfailingagain.com/2017/09/19/you-must-watch-this-elon-musk-video-of-rocket-fails/>

Any time Elon Musk makes a mistake, it does not come cheap.

That could not be more true when it comes to SpaceX, the aeronautics company he runs. On Thursday, Musk shared a video highlighting what happens when you fail to land an orbital rocket booster.

And it is spectacular.

“Long road to re-usability of Falcon 9 primary boost stage...When upper stage & fairing also reusable, costs will drop by a factor >100,” wrote Musk.

The video consists of a lowlight reel of SpaceX, featuring a lot of rockets blowing up with captions like “Rocket is fine? It’s just a scratch.”

Read the full article [here](#)

[Tesla is making a risky move by issuing \\$1.5 billion in debt](#)

[Matthew DeBord](#)

• **Tesla said it would issue \$1.5 billion in unsecured notes.**

- 1       • Issuing new debt deviates from previous equity-based capital raises.
- 2       • The carmaker has added substantial debt to its balance sheet since its SolarCity
- 3 merger last year.

4       [Continue reading “Tesla is making a risky move by issuing \\$1.5 billion in debt” →](#)

5       About 63,000 people have canceled preorders for the electric car over the course of the past

6 year, as revealed earlier this week by [Tesla CEO Elon Musk](#) ([https://web.archive.org/web/20200104074824/https://www.inc.com/justin-bariso/elon-musk-takes-](https://web.archive.org/web/20200104074824/https://www.inc.com/justin-bariso/elon-musk-takes-customer-complaint-on-twitter-from-idea-to-execution-in-6-days.html)

7 [customer-complaint-on-twitter-from-idea-to-execution-in-6-days.html](https://web.archive.org/web/20200104074824/https://www.inc.com/justin-bariso/elon-musk-takes-customer-complaint-on-twitter-from-idea-to-execution-in-6-days.html) (on the company’s quarterly

8 earnings call. (The number of orders dropped from about 518,000 to 455,000, Musk said.)

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*"...Elon Musk (Along with his Silicon Valley Cartel bromance frat boy buddies Eric Schmidt and Larry Page, et al) is a mobster-class criminal sociopath who hired business assassins to attack us and operated anti-trust and RICO law violating competitor "kill programs". He used his windfall of taxpayer funded cash and Goldman Sachs assisted stock market manipulations and intelligence agency staff and tools from In-Q-Tel and Google to engage in these crimes. Plaintiffs have demanded that the FBI arrest him and that the SEC, FTC and NHTSA prosecute him. Plaintiffs will make certain that his legacy, for the rest of time, reveals the true facts about his crimes and political manipulations..."*

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windshields. Plaintiffs demand a hearing, with Musk on-site, on a live Senate televised and webcast investigation hearing in Congress to go over each of these points.

Nobody On Earth Can Launder And Hide Illicit Cash, Or Bribe Politicians, Like Elon Musk  
He's worth an estimated \$39 billion, but has repeatedly said he's poor. He is a scumbag liar and a crook!

In one of a series of wild tweets posted last week, [Elon Musk stated](https://twitter.com/elonmusk/status/1256239554148724737) ( <https://twitter.com/elonmusk/status/1256239554148724737> ) he would be “selling almost all physical possessions” and that he would “own no house.” He appears to be actually following through with that promise, as chronicled in a great story [in The Wall Street Journal](https://www.wsj.com/articles/elon-musk-techs-cash-poor-billionaire-11588967043?mod=e2twd) ( <https://www.wsj.com/articles/elon-musk-techs-cash-poor-billionaire-11588967043?mod=e2twd> ) about Musk's personal finances that you should go read.

According to the *WSJ*, despite being worth an estimated \$39 billion on paper:  
...he has to borrow, sometimes a lot, to pay for his lifestyle and business investments without liquidating shares that help him maintain control of the companies he runs. About half his Tesla stock is pledged as collateral for personal loans, an April 28 financial filing shows. Maintaining his equity stake—about 20%, or around \$29 billion at its current valuation—is important for him to keep control over the Silicon Valley auto maker.

Musk also doesn't take a salary at Tesla, but he apparently became eligible for stock options worth more than \$1 billion this week. To get that money, he will need an eye-watering *\$592 million* to exercise the option, according to the *WSJ*. It's not clear if Musk has the money on hand to exercise that option or if the money raised from the house sales will be used to help pay for the sum. “Mr. Musk said he wasn't selling his possessions because he needs the money,” the *WSJ* reported.

The article also lists a few times Musk has said he's cash poor. Here's one example:

Before Tesla went public, Mr. Musk told a judge during a contentious divorce with his first wife that he had run out of cash and had taken on emergency loans from friends to support his family and pay living expenses.

Here's another:

Last year, Mr. Musk's ability to access cash came up again during a defamation lawsuit over

1 comments he made about a man involved in the rescue of a Thai soccer team from a flooded cave in  
2 2018. A lawyer in the case said in a filing that Mr. Musk had described himself as “financially  
3 illiquid.”

4 The whole article has a lot of history about Musk, interesting information about his finances  
5 backed up by regulatory filings, and numerous quotes from Musk himself, and I sincerely  
6 recommend taking 10 minutes [to read it in full](https://www.wsj.com/articles/elon-musk-techs-cash-poor-billionaire-11588967043?mod=e2twd). ( [https://www.wsj.com/articles/elon-musk-techs-](https://www.wsj.com/articles/elon-musk-techs-cash-poor-billionaire-11588967043?mod=e2twd)  
7 [cash-poor-billionaire-11588967043?mod=e2twd](https://www.wsj.com/articles/elon-musk-techs-cash-poor-billionaire-11588967043?mod=e2twd) )

8 Musk has Goldman Sachs, Welles Fargo and Wilson Sonsini Mobster-Class executive  
9 bankers hide his money in a rabbit warren of HUNDREDS of trusts, shell corporations and fake  
10 charities from South Dakota, to Switzerland to the Cayman Islands to Russia.

11 A federal investigation to show the tentacular diagram of scams has been demanded!

### 12 13 **Elon Musk’s Crimes He Is Never Prosecuted For:**

14  
15 **These are the illicit things that sociopath narcissist Musk has engaged in with the**  
16 **taxpayer cash he mooched from government treasuries from a wide group of reports and**  
17 **articles on-line:**

18  
19 1. Private investigators have produced reports on the Elon Musk and Tesla Motors  
20 fraud, stock rigging, bribery and safety investigations that Musk's Silicon Valley Sandhill  
21 Road venture capitalists cover-up.

22 2. Musk hides his money in illicit and false-front real-estate scams to avoid taxes and to  
23 launder money.

24 3. "His corrupt cobalt mines promote genocide in the Congo as seen in NETFLIX  
25 Black Earth Rising".

26 4. "His corrupt cobalt mines promote mass rape in the Congo as seen in NETFLIX  
27 Black Earth Rising".

28 5. "His corrupt cobalt mines promote child slave labor in the Congo as seen in

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1 NETFLIX Black Earth

2 Rising".

3 6. "He tries to bury his ill-gotten money from the taxpayers in gobs of real estate  
4 acquisitions and houses including his notorious purchase of the Vaughn DeGuigne Court  
5 mansion at 891 Crystal Springs Road, in Burlingame, California which is staged for his  
6 kinky sex parties and Illuminati-like cartel get-togethers..."

7 7. "His is not faithful to his girlfriends. Some of them are Ghislane Maxwell-type  
8 enablers, too, just to hang around his money and promote his sex schemes like Maxwell did  
9 for Epstein"

10 8. "The workers that build his batteries die or sicken from toxic poisoning and Musk  
11 tries to hide his dirty factories overseas"

12 9. "Tesla bribes U.S. Senators with cash and stock in order to get free taxpayer funds"

13 10."He is addicted to drugs and booze"

14 11."He has 'sociopath-class' mental issues and he is a narcissist..."

15 12."Tesla has had more recalls for safety defects, per volume, than any other car maker.  
16 Musk refuses to allow the use of the word RECALL but the facts are the facts."

17 13."It is so easy to hack any Tesla and crash it, break into it or give it bad braking orders  
18 that it is criminally negligent to allow Tesla's on the street. Even the Chinese have hacked  
19 Tesla's from the other side of the world! Tesla's have been hacked and remotely crashed, the  
20 drivers killed and Tesla covers this up..."

21 14."His partner: Steve Jurvetson, has been charged with sex and corruption issues"

22 15."He arranged government kick-backs with the White House"

23 16.His entire current existence is based on stock market scams created with taxpayer  
24 dollars and Goldman Sachs securities manipulations

25 17."He is the world's biggest government mooch and has taken more taxpayer cash than  
26 anyone in U.S. History as a billionaire who does not need a hand-out"

27 18."He is a member of the Palo Alto Tech Mafia operated by Stanford University gay  
28 frat house guys"



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1 19."Google (who is a major Tesla investor) hides all negative Musk/Tesla news in  
2 digital media globally and hypes TSLA stock in order to profiteer with Tesla stock. This is a  
3 violation of federal SEC laws"

4 20."More drivers have been caught driving drunk, in Tesla's, than any other car Per  
5 Capita produced"

6 21."Google boss Larry Page is Musk's 'bromance' boyfriend buddy and he uses Google  
7 to cover-up Musk's scandals"

8 22."His so-called 'foundation" is just a payola and tax evasion scam for his family. It is  
9 a charity scam"

10 23."His batteries are the most dangerous use of lithium ion storage ever conceived"

11 24."His partner: Panasonic, has been charged with multiple corruption, dumping, price  
12 rigging and manipulation crimes around the globe"

13 25."Almost all of the internet 'Tesla Fanboys' are Russian troll farms and hired bloggers  
14 that Musk pays vast amounts of money to in order to hype up a fake image for him. Musk  
15 has over 1000 click-farm and Russian troll bloggers under his employ via various false-front  
16 cover organization contractors.

17 26."The drug and murder-for-hire website: Silk Road, was built at drug-enthusiast  
18 Musk's company SpaceX by Musk's programmer and Musk hires many people from a group  
19 called: In-Q-Tel, who were caught with tons of cocaine on their airplanes in a DEA raid"

20 27."His SpaceX is nothing more than a domestic spy satellite company"

21 28.In-Q-Tel supplies a number of Musk's staff, yet In-Q-Tel has been accused of  
22 numerous criminal ventures and abuses of the public.

23 29.You never hear about these crimes because Musk's buddies in Silicon Valley control  
24 90% of the global media these days and they censor any bad news about Musk in order to  
25 protect their Cartel.

26 30."Musk's brain chip company tortures monkey's and other small animals in bad  
27 science experiments"

28 31."His father screwed his daughter and got her pregnant. His father seems to be a

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1 pedophile and incest participant"

2 32."Dianne Feinstein and her family covertly own many Musk interests and arranged  
3 for him to get his funds from the taxpayers. She helped sabotage his competitors in her  
4 district"

5 33."You can't put out the fires when his batteries explode say fireman because Lithium  
6 fires are military class thermo-dynamics"

7 34."The fumes from his lithium ion thermal battery vapors give you cancer, lung and  
8 brain damage"

9 35.Psychologists say that Musk is a self promoting, narcissistic, multi-billion dollar,  
10 self-aggrandizing PR hype addict.

11 36.Many of us know these facts from personal interaction with Musk, his companies  
12 and his politicians.

13 37.Everything in these reports can be proven in a jury trial, Congressional hearings or  
14 live TV debates but Musk would rather die than face uncontrolled public scrutiny.

15 38.Musk will do anything to keep this information from getting out, including hiring  
16 attack services like his Fusion GPS, Black Cube, Gawker and Gizmodo Kill services.

17 39.While Musk's dirty deeds sound like a bad Hollywood movie script. It all really  
18 happened and there is now massive hard copy evidence to prove it.

19 40.Elon Musk exists because he bribed DNC politicians including Obama, Clinton and  
20 Senators Feinstein, Reid, Boxer, Harris, Spier and Pelosi to give him free taxpayer cash and  
21 government resources from The U.S. Government and the California political tax pool.

22 41.When you follow-the-money and the insider trading, stock ownership and crony  
23 payola kick-backs. The payola between Musk, his scummy cronies and the politicians is  
24 proven.

25 42.The Musk empire pays bribes in billions of dollars of Google (Where Musk's boy  
26 buddy Larry Page works), Twitter, Facebook, Tesla, Netflix and Sony Pictures stock and  
27 stock warrants which is never reported to the FEC

28 43.The Musk empire pays bribes in billions of dollars of Google, Twitter, Facebook,

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1 Tesla, Netflix and Sony Pictures search engine rigging and shadow-banning which is never  
2 reported to the FEC

3 44.The Musk empire pays bribes in free rent

4 45.The Musk empire pays bribes in Male and female prostitutes

5 46.The Musk empire pays bribes in cars

6 47.The Musk empire pays bribes in dinners at fancy restaurants

7 48.The Musk empire pays bribes in socialite party financing

8 49.The Musk empire pays bribes in Sports Event Tickets

9 50.The Musk empire pays bribes in Political campaign printing and mailing services

10 "Donations"

11 51.The Musk empire pays bribes in Secret PAC Financing. Musk's empire is a massive  
12 political financing conduit for the DNC politicians via a tentacular array of covert shell  
13 corporations, trusts, 501C's and stock bribes.

14 52.The Musk empire pays bribes in Jobs in Corporations in Silicon Valley For The  
15 Family Members of Those Who Take Bribes And Those Manage Bribes

16 53.The Musk empire pays bribes in "Consulting" contracts from McKinsey Consulting  
17 as fronted pay-off gigs

18 54.The Musk empire pays bribes in Overpriced "Speaking Engagements" which are  
19 really just pay-offs conduited for donors

20 55.The Musk empire pays bribes in Private jet rides and use of Government fuel depots  
21 (ie: Google handed out NASA jet fuel to staff)

22 56.The Musk empire pays bribes in commercial Real Estate

23 57.The Musk empire pays bribes in Fake mortgages

24 58.The Musk empire pays bribes in The use of Cayman, Boca Des Tores, Swiss and  
25 related money-laundering accounts and The use of HSBC, Wells Fargo, Goldman Sachs and  
26 Deustche Bank money laundering accounts and covert stock accounts

27 59.The Musk empire pays bribes in Free spam and bulk mailing services owned by  
28 Silicon Valley corporations

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1 60.The Musk empire pays bribes in the use of high tech law firms such as Perkins Coie,  
2 Wilson Sonsini, MoFo, Covington & Burling, etc. to conduit bribes to officials

3 61.The U.S. Energy Dept (GOVT) has been covering-up organized political crime  
4 activities in which government funds are being used as a slush-fund to pay off political  
5 campaign financiers and to pay for CIA/GPS Fusion-Class attacks on Silicon Valley  
6 business competitors via Musk political conduits.

7 62.Political campaign financiers and government agency staff share stock market  
8 holdings with each other under family trusts, shell corporations and layered Goldman Sachs  
9 accounts.

10 63.The basic Musk scam-deal goes like this: *"Obama funds Tesla, Musk conduits*  
11 *campaign funds to Obama, top Obama staff profit off of insider Musk stocks..."*

12 64.Elon Musk is a criminal, a mobster, an asshole, a balding fake-hair wearing, plastic  
13 surgery-addicted, bi-sexual douchebag, woman-abusing, sex addicted, tax evader. Plaintiffs  
14 can put this in writing because all of those identifications regarding Musk can be proven in  
15 court and are documented in existing lawsuits and news stories.

16 65.Musk exploits poor people and child slaves in the Congo and Afghanistan to mine  
17 his lithium and Cobalt. Look up this phrase on the top search engines: "child labor electric  
18 car batteries".

19 66.Musk spends billions per year to hire Russian trolls, fake blogger fan-boys and buy  
20 fake news self-glory look-at-me articles about himself.

21 67.Musk thinks he is the 'Jesus' of Silicon Valley and he will do anything to make the  
22 public think so.

23 68.Musk is insecure because his father was abusive and his "trophy wife" Mother is  
24 overbearing so he developed sociopath-like mental issues.

25 69.Musk has been professionally diagnosed as a 'psychotic narcissist.

26 70.He public stated on an investor call that he uses drugs and alcohol to get through the  
27 night. Plaintiffs have the tapes.

28 71.Musk relies on Google and the DNC Main Stream News (MSN) to hide bad news

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1 about him.

2 72.Fake News manipulator Google is run by Larry Page. Larry is Musk's investor and  
3 bromance 'Butt buddy'. They share an apartment.

4 73.Musk uses massive numbers of shell companies and trust funds to self-deal, evade  
5 the law and hide his bribes and stock market insider trading.

6 74.His brother ran Solar City and is now under federal investigation for securities fraud.

7 75.A huge number of Tesla drivers have been killed; pedestrians and oncoming drivers  
8 have also been killed, and Musk covers it up.

9 76.Extremist politicians and their controlled news outlets refuse to allow any articles  
10 about Musk's crimes to be printed because they benefit from Musk's crimes.

11 77.Investor oligarch's Tim Draper and Steve Jurvetson are so fanatical about not being  
12 embarrassed from a Tesla bankruptcy that they will pump the TSLA stock and threaten  
13 anybody who might disclose the Musk misdeeds.

14 78.Peter Thiel, a Musk 'boyfriend' also protects Musk. Musk, and his cronies, use  
15 Palantir, Google and related software to scan the entire internet every few minutes for any  
16 occurrence of the words: "Musk", "Tesla" or "Tesla Fire". They send trolls and fake  
17 bloggers (Many of them Russian) to put pro-Musk comments on the comments section of  
18 any blogs or articles discussing those topics and try to flood out the truth about Musk.

19 79.In EVERY blog that you read that mentions 'Musk', at least 1/3 of the comments  
20 have been placed their by Musk's paid shills.

21 80.There are no "Tesla Fan Boys". All of the fanatic Tesla comments on the internet are  
22 Musk's, Thiel's, Jurvetson's and Draper's fake fanboy trolls. Musk, himself, stays up late at  
23 night pretending to be a 'Tesla Fan Boy' on blogs.

24 81.The 'Silicon Valley Mafia; cartel of frat boy sociopath venture capitalists like Steve  
25 Jurvetson, Tim Draper, Eric Schmidt, et al; threaten those who do not support the cult of  
26 Tesla or their political candidates.

27 82.Musk holds the record for getting sued for fraud by his investors, wives, former  
28 partners, employees, suppliers and co-founders.

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1 83. Elon Musk has gone out of his way to hire hundreds of ex-CIA and In-Q-Tel staff  
2 and assign them to "dirty tricks teams" to attack his competitors and elected officials who  
3 Musk hates.

4 84. Musk never founded his companies. He took Tesla away from the founder: Marty, in  
5 a hostile take-over!

6 85. Musk's "Starlink" satellites are domestic spy and political manipulation tools - never  
7 get your internet from one. SpaceX is entirely a spy satellite operation.

8 86. The same kind of EMF radiation proven to cause cancer from cell phones exists in  
9 massive amounts in a Tesla.

10 87. Musk can't fix a car or build a rocket and has almost no mechanical skills he can't  
11 build or work on any of the things he made himself famous for.

12 88. If you pull a report of every VIN# of every Tesla ever built and cross reference that  
13 with insurance, repair and lawsuit records you will find that the "per volume" fire, crash,  
14 death and defect rate is THE WORST of any car maker in history!

15 89. Musk is a lying con artist and partners with Goldman Sachs to rig the stock market.  
16 Sachs has a dedicated team of 18+ men who rig stocks and valuation bumps for Musk.

17 90. Over 1000 witnesses can prove every one of those claims in any live televised  
18 Congressional hearing!

19 91. Senators Dianne Feinstein, Harry Reid, Nancy Pelosi, Kamala Harris and their  
20 associates own the stock in Tesla Motors and/or its suppliers and mining companies. That is  
21 why they criminally help cover-up investigations of Tesla!

22 92. All of this was reported, in writing, to James Comey, Patricia Rich and David  
23 Johnson at the FBI by those who supplied this information but Musk has yet to be arrested  
24 because crooked California politicians, who own his stock, protect him from arrest.

25 93. Why aren't all of those parties in prison if it is so easy to prove the crime? Think  
26 back to recent history: the heads of the Department of Energy, the FBI, The DOJ and the  
27 U.S. Attorney General were kicked out of their jobs for corruption. THIS was the corruption  
28 they were doing. They all knew about this crime but they were covering it up.

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1 94.Musk took over Tesla Motors in a hostile take-over in order to exploit lithium, cobalt  
2 and other mining corruption deals for his business partners.

3 95.When you take a look at the 'lithium' in Musk's horrifically miss-engineered lithium  
4 ion batteries you will uncover horrible crimes engaged in to acquire it.

5 96.His batteries cause wars in the Congo, Afghanistan and Bolivia from the corrupt  
6 mining deals involved with mining lithium and cobalt.

7 97.Lithium ion batteries are insider trading-owned by ex-CIA boss Woolsey and GOVT  
8 Boss Chu.

9 98.Lithium ion batteries excrete chemicals that mutate fetuses when they burn and  
10 destroy your brain, lungs and nervous system when they burn

11 99.Musk's batteries kill the factory workers who make them

12 100.Musk's batteries cause Panasonic to be one of the most corrupt companies in the  
13 world

14 101.Musk's batteries poison the Earth when disposed of

15 102.Musk's batteries can't be extinguished by firemen

16 103.Musk's batteries poison firemen when they burn

17 104.Musk's batteries are based on criminally corrupt mining schemes like URANIUM  
18 ONE

19 105.Musk's batteries have over 61 toxic chemicals in them

20 106.Musk's batteries come from an industry that spends billions on internet shills and  
21 trolls used to nay say all other forms of energy

22 107.Musk's batteries and are insider-trading owned by corrupt U.S. Senators who are  
23 running a SAFETY COVER-UP about their dangers.

24 108.Apple products with lithium ion batteries have been exploding and setting people  
25 on fire.

26 109.Over time the chemical dendrites, or deposits, inside each Musk battery grow worse  
27 and increase the chances of explosion as they age

28 110.Musk's LITHIUM ION BATTERIES BECOME MORE AND MORE LIKELY TO

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1 EXPLODE AS TIME GOES ON AND AS THEY AGE. This is not a theory. This is a  
2 scientific fact. That is why you hear about more and more lithium batteries catching fire and  
3 blowing up.

4 111.Additionally, scientists also speculate that the increasing presence of low energy  
5 nuclear background energy and wifi energy in the environment is making lithium ion  
6 batteries explode more often lately. This theory is upheld by the increasing number of FAA  
7 reports about commercial airline cabins suddenly “filling up with toxic smoke” as some  
8 lithium ion battery explodes in someones overhead luggage. As commercial jets go higher  
9 they lose the protection of the atmosphere and are subjected to more gamma (and other)  
10 radiation from overhead. This makes the already unstable lithium ion batteries on board  
11 blow up.

12 112."Bad Guys" have figured out how to make them explode remotely in devices by  
13 making the device electronics cause the batteries to overload.

14 113.The dangers of lithium ion batteries are hidden by CNN and Main Stream News  
15 (MSN) because pretty much only the DNC people profit from them and the DNC folks  
16 control CNN and the MSN.

17 114.The Obama Administration promised Silicon Valley oligarchs the market  
18 monopoly on lithium ion batteries and the sabotage of fuel cells in exchange for campaign  
19 financing and search engine rigging

20 115.United States Senators that are supposed to protect us from these deadly products  
21 own the stock market assets of them so they protect them and stop the FDA, OSHA, DOT &  
22 NHTSA from outlawing them.

23 116.Tom Steyer is a notorious DNC financier. His partner, Margaret Sullivan ran, the  
24 federal USAID agency, USAID sent all of the DNC campaign financiers in Silicon Valley a  
25 federal ‘report’ from USAID that said there was “A TRILLION DOLLARS OF LITHIUM  
26 IN AFGHANISTAN” and promised to give those lithium mines, EXCLUSIVELY, to the  
27 Silicon Valley venture capitalists if they funded and web search manipulated the election for  
28 Obama to take over the White House. Plaintiffs have the documents proving this. In other



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1 words, a re-up of the Afghan War was caused by Elon Musk and it killed American soldiers  
2 so that Musk could buy more mansions and trophy wives.

3 117. Alkaline, NiCAD and hundreds of other battery chemistry DO NOT have all of  
4 these problems but Lithium Ion batteries get a monopoly because of politician insider  
5 trading ownership.

6 118. Tesla Motors has caused far more deaths and injuries than the world generally  
7 knows about.

8 119. A recent fire on U.S. Highway 101 near Mountain View, CA, burned the driver  
9 alive and killed him.

10 120. In Florida two kids died in a Tesla, burned alive, screaming in agony.

11 121. A man died in agony in a Tesla crash in Malibu that set Malibu Canyon on fire.

12 122. A young woman, at the start of life, and her boyfriend were burned alive in their  
13 crashed Tesla.

14 123. There are many more deaths and crashes than you have seen in the Main Stream  
15 News (MSN) The deaths and the cover-ups are endless.

16 124. Senators Dianne Feinstein, Harry Reid, Nancy Pelosi, Kamala Harris and their  
17 associates own the stock in Tesla Motors and/or its suppliers and mining companies and  
18 they cover-up and halt investigations and laws designed to save the public. They, and their  
19 crony's, spend over \$1B a year to still and troll hype about lithium ion batteries and cover-  
20 up the dangers.

21 125. Lithium ion EVs are more prone to battery fires. experts say that their lithium-ion  
22 batteries can fuel hotter fires that release toxic fumes and are more difficult to put out.

23 126. Lithium ion fires keep reigniting which explains why it takes so long and requires  
24 copious amounts of water or foam (it is an electric fire, after all) to smother the flames.

25 127. Tesla employee Bernard Tse and his team warned Elon Musk about these dangers  
26 in 2008 and they got fired and/or warned to "say nothing" by Musk.

27 128. Three top Tesla engineers died in a plane crash next to Tesla offices in San Carlos  
28 after two of them agreed to become whistle-blowers.

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1 129.The DNC bosses, Congress people and federal executives own the stock in lithium,  
2 Solar and EV markets and use kickbacks from those markets (Especially via convoluted  
3 campaign finance laundering via Elon Musk) to finance the DNC.

4 130.The DNC bosses and Musk use character assassination as their main political tool  
5 against any member of the public who speaks out against their felony stock market scams  
6 and PizzaGate-like scandals. The Harvey Weinstein reports by Ronan Farrow show that they  
7 have teams of hired goons that they pay to destroy people's lives. They use Black Cube,  
8 Mossad, In-Q-Tel, Stratfor, Gawker Media, Gizmodo Media, Media Matters, David Brock,  
9 Sid Blumenthal, NY Times, Google servers, Facebook servers, Podesta Group, Perkins Coie,  
10 Covington & Burling and a host of "media assassins".

11 131.Musk's "cabin boy": Jared Birchell, runs around covering up Musk crimes all day

12 132.Gawker and Gizmodo Media set-up the attack stories and, in paid partnership with  
13 Google, Google kicks their attack links around the globe, in front of 8 Billion people,  
14 forever. Google locks the attack articles of its enemies on the front top search results of  
15 Google search results forever, on purpose! Google and Musk are partners-in-crime.

16 133.Larry Page steals technology for Google and Musk meets with Larry Page to advise  
17 him on which technologies to steal and how to bypass FEC laws.

18 134.Musk has exceeded FEC campaign finance limits by billions of dollars via "in-  
19 kind" services.

20 135.Reports at <https://www.propublica.org> prove some of these assertions

21 136.Reports at <https://www.transparency.org> prove some of these assertions

22 137.Reports at <https://www.icij.org> prove some of these assertions

23 138.Reports at <http://londonworldwide.com> prove some of these assertions

24 139.Reports at <https://stopelonfromfailingagain.com> ( PER THE WAYBACK  
25 MACHINE, Internet Archives) prove some of these assertions

26 140.Reports at [https://www.zerohedge.com/news/2019-02-24/tesla-slams-tree-florida-](https://www.zerohedge.com/news/2019-02-24/tesla-slams-tree-florida-bursting-flames-and-killing-driver)  
27 [bursting-flames-and-killing-driver](https://www.zerohedge.com/news/2019-02-24/tesla-slams-tree-florida-bursting-flames-and-killing-driver) prove some of these assertions

28 141.Reports at [Elon Musk is a total fraud - nypost.com](https://nypost.com) (

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1 <https://nypost.com/2018/07/21/elon-musk-is-a-total-fraud/> ) prove some of these assertions

2 142.Reports at [Elon Musk is a total fraud: Truth about Tesla billionaire exposed](https://www.news.com.au/technology/innovation/inventions/elon-musk-is-a-total-fraud/news-story/f849a58894956424f03e7606a222b9eb) (  
3 [https://www.news.com.au/technology/innovation/inventions/elon-musk-is-a-total-fraud/](https://www.news.com.au/technology/innovation/inventions/elon-musk-is-a-total-fraud/news-story/f849a58894956424f03e7606a222b9eb)  
4 [news-story/f849a58894956424f03e7606a222b9eb](https://www.news.com.au/technology/innovation/inventions/elon-musk-is-a-total-fraud/news-story/f849a58894956424f03e7606a222b9eb) ) prove some of these assertions

5 143.Reports at [Elon Musk Passes the Hat Again on Capitol Hill... And in China](https://townhall.com/columnists/lawrencemeyers/2019/09/10/elon-musk-passes-the-hat-again-on-capitol-hill-and-in-china-n2552839) (  
6 [https://townhall.com/columnists/lawrencemeyers/2019/09/10/elon-musk-passes-the-hat-](https://townhall.com/columnists/lawrencemeyers/2019/09/10/elon-musk-passes-the-hat-again-on-capitol-hill-and-in-china-n2552839)  
7 [again-on-capitol-hill-and-in-china-n2552839](https://townhall.com/columnists/lawrencemeyers/2019/09/10/elon-musk-passes-the-hat-again-on-capitol-hill-and-in-china-n2552839) ) prove some of these assertions

8 144.Reports at [About Elon Musk - A WASHINGTON DC ORGANIZED CRIME](https://xyzcase.weebly.com/about-elon-musk.html) (  
9 <https://xyzcase.weebly.com/about-elon-musk.html> ) prove some of these assertions

10 145.Reports at [Mark Spiegel: Elon Musk is 'a pathological liar'](https://www.youtube.com/watch?v=msxq2OkCXnE) (  
11 <https://www.youtube.com/watch?v=msxq2OkCXnE> ) prove some of these assertions

12 146.Reports at <https://nationalnewsnetwork.net/> prove some of these assertions

13 147.Reports at <http://www.videonet111.com> prove some of these assertions

14 148.MUSK'S SPACEX COMPANY Will have all of it's satellites destroyed in moments  
15 as soon as China gets pissed off: [https://www.japantimes.co.jp/news/2019/02/12/asia-](https://www.japantimes.co.jp/news/2019/02/12/asia-pacific/chinas-space-debris-cleanup-may-cover-story-arms-u-s-satellites-pentagon/)  
16 [pacific/chinas-space-debris-cleanup-may-cover-story-arms-u-s-satellites-pentagon/](https://www.japantimes.co.jp/news/2019/02/12/asia-pacific/chinas-space-debris-cleanup-may-cover-story-arms-u-s-satellites-pentagon/)

17 149.WE HAVE ASKED THE FBI, DOJ, OSC, SEC, FTC, GAO, U.S. CONGRESS,  
18 AND OTHERS, TO INVESTIGATE AND PROSECUTE MUSK AND HIS CRONY  
19 OPERATION!

20 150.ELON MUSK'S PAID-FOR MEDIA SHILLS COVER UP HIS CORRUPTION  
21 AND PUSH PUFF-STORIES ABOUT MUSK. NEVER TRUST THEM TO BE  
22 ANYTHING BUT BIASED PROPAGANDA OUTLETS. MANY OF THEM OWN  
23 TESLA STOCK: Electrek, Google, Facebook, CNN, Huffington Post, Dianne Feinstein's PR  
24 office, Nancy Pelosi, Steven Chu, MSNBC, PayPal, KPIX-TV, San Jose Mercury News,  
25 Any Hearst owned entity, The SF Chronicle, Motley Fool, Green Car Congress, The  
26 executive staff of the DNC, The NY Times, etc.

27 151.Plaintiffs saw Elon Musk commit crimes and we saw the Obama White House  
28 cover-up those crimes. Plaintiffs, and Plaintiffs associates, worked for Bright Automotive,

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1 Zap Electric, Aptera, Eco Motors, The United States Department of Energy and the federal  
2 Office of Management and Budget and Tesla Motors itself. Americans have an expectations  
3 that their tax dollars will be used in a fair and legal manner and not to pay off crony  
4 campaign financiers like Elon Musk.

5 152.Americans have an expectations that fair market competition will decide which  
6 companies get to live or die and that no campaign financiers gets to order the White House  
7 to produce the death or success decision about any American business. Elon Musk's  
8 operation exists entirely because of criminal corruption and all of his companies must be  
9 shut down by federal law enforcement.

10 153.For nearly a decade, the U.S. Department of Energy has refused to comply with  
11 Freedom of Information Act (FOIA) requests for copies of Tesla Motors entire D.O.E.  
12 funding application documents. Former D.O.E. employees have shredded copies of those  
13 documents in order to keep them from being exposed to the public and the media. Why  
14 would they do that? Because those documents reveal felony criminal fraud by Tesla Motors,  
15 federal violations of the Section 136 law requirements and manipulations of the "hard-  
16 wiring" of the entire D.O.E. program. Those documents, which we have seen (and some  
17 Senate staff have private copies of) prove that, in a side-by-side comparison with all other  
18 applicants, the Tesla application was manipulation, rigged, false-reviewed and crony-  
19 advanced in order to pay-off certain campaign financiers and damage their competitors.

20 154.Demand that the U.S. Department of Energy stop breaking the law and comply with  
21 the FOIA requests to stop hiding the incriminating evidence in the Tesla files. Demand that  
22 the public be shown the original paper and not the later, "doctored" versions.

23 155.Plaintiffs saw Elon Musk operate an entirely illegal and unethical program based on  
24 State and Federal corruption. Plaintiffs told this, in writing and in person to the U.S.  
25 Attorney General: Eric Holder, who then quit his job after we reported these facts to him.

26 156.Plaintiffs reported that Elon Musk lied about vast number of dangers of the lithium  
27 ion chemistry he was using. Nothing was done.

28 157.Plaintiffs reported that Plaintiffs associates at The U.S. Government were having

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1 their safety reports on lithium ion danger suppressed. Nothing was done.

2 158.Plaintiffs reported that Elon Musk’s credit rating and financial records were  
3 fraudulent and amounted to “cooking the books”. Nothing was done.

4 159.Plaintiffs reported bribes paid by Musk’s lobbyists and associated to government  
5 officials in order to grease the skids for his crony payola. Nothing was done.

6 160.Plaintiffs reported that Goldman Sachs and Tesla Motors were operating a stock  
7 fraud pump-and-dump scam to manipulate Elon Musk’s stock holdings. Nothing was done.

8 161.Plaintiffs reported over a hundred illegal and corrupt actions by Elon Musk and his  
9 mob of Silicon Valley gangsters. Nothing was done.

10 162.If you have an ounce of morality, then you will not want to help Musk & Tesla  
11 profit from the crony political corruption that created them. Musk exists because he bribes  
12 politicians & acts as an illegal campaign financing conduit.

13 163.DOT/NHTSA has covered up years of reports about an acceleration surge issue that  
14 can suddenly crash your Tesla into walls and drive it off cliffs. It is either a known hacking  
15 attack or the effect of WiFi on Tesla electronics. Either can kill you.

16 164.Musk & Tesla are pure evil & exist because of hyper-corruption. You don’t want to  
17 contribute to their evil or be part of it in any way. You are funding evil & supporting  
18 criminal corruption by buying a Tesla or any Elon Musk owned product like Solar City,  
19 Tesla, Space X, Hyperloop, etc.!

20 165.Elon Musk spent more money, than any other car company in history, to do the  
21 exact same things that any other car has done, or could do, for 20 times less money. Musk’s  
22 Tesla was \$100,000.00 over budget, per car, at the time that Musk was handed his crony  
23 Dept. of Energy froms by Steven Chu. Musk has no clue how to operate a car company.

24 166.In one lawsuit it is noted that: “...Plaintiffs and Tesla both applied for funds at the  
25 same time, in the same funding cycle in the same program. Tesla had the historically epic  
26 number of horrific issues listed below, which were known to GOVT at the time of  
27 application, and Plaintiffs had NONE of these issues. How can any court, or rational person,  
28 believe that Plaintiffs were not intentionally bypassed, targeted and damaged for political

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1 reasons while Tesla was simultaneously approved for political reasons, when the  
2 comparative metrics between the two applicants prove the largest merit disparity in the  
3 entire recorded history of the U.S. Department of Energy....the singular, and only, review  
4 criteria used by Department of Energy officials was: WHICH ONE BRIBED THE  
5 CAMPAIGN FINANCE GROUP FOR BARACK OBAMA?!"; Thus proving that Tesla  
6 exists because of organized-crime level political corruption.

7 167.Elon Musk's self-driving "autopilot" feature, which keeps crashing and failing, is  
8 his attempt to scam taxpayer cash from Dept. of Transportation and Dept. of Energy public  
9 funds. He is only trying to do it to get more free federal cash.

10 168.The inventor of lithium ion batteries has confessed that lithium ion batteries blow  
11 up eventually. He says that deadly dendrites plague lithium-ion battery technology. The  
12 dendrites accumulate as part of the standard charging and recharging cycle and eventually  
13 cause a short circuit that often results in a smoldering or burning battery. These dendrites are  
14 destined to eventually blow up most Tesla cars and many electronic devices using lithium  
15 ion!

16 169.The CIA's software designed to take over any Tesla on Earth and kill the driver,  
17 passengers and bystanders has been released in the wild and every hacker on Earth can now  
18 easily get a copy of it and kill you in your Tesla!

19 170.Ex-employees have leaked faked financial records, evidence of massive click-farm  
20 fake social media manipulation and evidence of unreported deaths and accidents. They say  
21 that most Tesla's have one kind of defect or another.

22 171.If you read about the dirty deeds and cocaine dealings with the In-Q-Tel airplanes  
23 called "Cocaine 1" & "Cocaine 2", & the corruption behind the company called In-Q-Tel &  
24 Musk's software programmer who ran "The Silk Road" drug & murder service then you  
25 must be concerned that many In-Q-Tel people work for Musk. Why does Musk need dirty  
26 druggies & spies on his payroll unless he is running covert drug and business spying  
27 activities?

28 172.Ex-employees, Gawker writers and gay lawyers from Covington & Burling have

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1 leaked stories that Elon Musk, Reid Hoffman, Larry Page are “butt buddies”.

2 173.Musk is anti-American and Anti-Worker Rights and has been caught flying in H1-B  
3 cheap offshore labor and exploiting immigrants for his deadly profits. Musk hates unions  
4 and worker rights efforts.

5 174.Elon Musk gets the Cobalt chemical to make his lithium ion batteries from slave  
6 trade and blood-money corruption in the Congo!

7 175.The lithium ion batteries that Musk uses also blow up when they naturally  
8 encounter Low Energy Nuclear (LENR) effects in the ambient environment. Millions of  
9 chemicals don’t blow up from LENR’d but lithium ion does!

10 176.If you are a Democrat then know that Elon Musk cost you the Hillary Clinton  
11 campaign because of his payola schemes. If you are a Republican, know that Elon Musk is  
12 the epitome of the worst form of DNC crony corruption you ever saw!

13 177.Musk bribed California politicians to give him hundreds of millions of dollars of  
14 taxpayer dollars & resources he never earned or worked for. He only got those crony payola  
15 perks handed to him because he operated as an illicit front for corrupt campaign financing  
16 for Dianne Feinstein, Jerry Brown, Harry Reid, Barack Obama and Hillary Clinton.

17 178.Multiple parties have filed “Demands For The Arrest of Elon Musk” with the FBI,  
18 DOJ, AG, FTC, SEC and other law enforcement agencies. It is not likely that Musk, or his  
19 companies will survive a full investigation.

20 179.Tesla and Solyndra sit on the same land in Fremont, CA. Solyndra was raided by  
21 the FBI for corruption. Tesla SHOULD be raided by the FBI for corruption. Both companies  
22 had kick-back crony payola schemes with Senator Dianne Feinstein. She owned the land,  
23 lease, HR, construction company and supplier interests and stock for both companies in one  
24 of the most massive conflict-of-interest crony financing schemes in U.S. history. Elon Musk  
25 and the Feinsteins are corruption partners.

26 180.People who see you in a Tesla think of you as a “Tone Deaf Douchebag”, “Tesla  
27 Tool!”, “Arrogant Prick”, “Ostentatious Obama Oaf”, “Sheep”, “Mindless Yuppie Scum”,  
28 “Misogynistic Silicon Valley Clone”, “Self-promoting Elitist Douche”, “Fake News Reading

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1 Main Stream Boob”, “Naive Idiot” or other bad things.

2 181. Elon Musk is one of the main financiers behind Barack Obama & Hillary Clinton,  
3 both of whom have been charged with corruption. Musk endlessly tweets lies & “...No I  
4 didn’t do those bad things” BS but nobody else supports him.

5 182. Tesla financial records are “cooked” in a fraudulent manner to make the stock  
6 market valuation of Tesla a falsely manipulated factor. Musk uses “pre-orders”, by his own  
7 investors, to fake sales and wrote emails to customers asking them to put small deposits  
8 down so he could book them as fully paid sales in one of a large number of stock and loan  
9 valuation frauds. Musk and his investors practice stock market skims, pump-and-dumps and  
10 Flash Boy manipulations.

11 183. Lithium ion batteries are blowing up, starting fires &, generally, destroying  
12 people’s homes, cars, electronics & physical health. Boeing was ordered to stop flying the  
13 787 Dreamliner because it's Lithium ion batteries are catching fire spontaneously. A group  
14 of silicon valley venture capitalists forced/leveraged the government to buy & pay for these  
15 specific batteries, that they have stock in, in order to benefit their profit margins. Other  
16 batteries don’t have these problems. They knew about the dangers from day one, but put  
17 greed ahead of safety. There are thousands & thousands of reports of spontaneous lithium  
18 ion fires but the VC's who back lithium ion pay to keep this information hushed up. Millions  
19 of these batteries have been recalled for fire risk. The VC's tried to push as many as they  
20 could before they got caught. Now they are caught. These VC's & the Senators they bribed  
21 own stock in lithium mining companies too.

22 184. Tesla Motors has filed a patent which states the following , THESE ARE TESLA  
23 MOTORS WORDS warning about a crisis, the level of which they never disclosed to the  
24 consumer: *“Thermal runaway is of major concern since a single incident can lead to*  
25 *significant property damage &, in some circumstances, bodily harm or loss of life. When a*  
26 *battery undergoes thermal runaway, it typically emits a large quantity of smoke, jets of*  
27 *flaming liquid electrolyte, & sufficient heat to lead to the combustion & destruction of*  
28 *materials in close proximity to the cell. If the cell undergoing thermal runaway is*



1 *surrounded by one or more additional cells as is typical in a battery pack, then a single*  
2 *thermal runaway event can quickly lead to the thermal runaway of multiple cells which, in*  
3 *turn, can lead to much more extensive collateral damage. Regardless of whether a single*  
4 *cell or multiple cells are undergoing this phenomenon, if the initial fire is not*  
5 *extinguished immediately, subsequent fires may be caused that dramatically expand the*  
6 *degree of property damage. For example, the thermal runaway of a battery within an*  
7 *unattended laptop will likely result in not only the destruction of the laptop, but also at*  
8 *least partial destruction of its surroundings, e.g., home, office, car, laboratory, etc. If the*  
9 *laptop is on-board an aircraft, for example within the cargo hold or a luggage*  
10 *compartment, the ensuing smoke & fire may lead to an emergency landing or, under more*  
11 *dire conditions, a crash landing. Similarly, the thermal runaway of one or more batteries*  
12 *within the battery pack of a hybrid or electric vehicle may destroy not only the car, but*  
13 *may lead to a car wreck if the car is being driven or the destruction of its surroundings if*  
14 *the car is parked”. See <http://whoisonmusk.com> for more. ..*

15 185. Tesla's own staff, & every fire department, have now admitted that once a lithium  
16 ion fire gets started in a Tesla, that it is impossible to extinguish burning lithium ion  
17 material. This is Tesla's own words in THEIR patent filing, (You can look it up online)  
18 saying that the risk is monumental. Tesla has 6800 lithium ion batteries, any one of which  
19 can “go thermal”, start a chain reaction and blow up all of the rest of the 6800+ deadly  
20 batteries! Tesla drivers have been burned alive in thermal globs of flaming lithium ion,  
21 plastics & metal. Bystanders have heard their horrific screams of unutterable pain & terror as  
22 they were burned alive! Tesla fires can't be extinguished & the bodies are burned into  
23 “unrecognizable lumps of charred flesh”, according to fireman.

24 186. Lithium Ion batteries “go thermal” in peoples pockets, in your notebook, especially  
25 in a Tesla & Fisker car. There are tens of thousands of articles documenting this & there is a  
26 cover-up by the VC's that fund these things to keep this fact out-of-sight. Making Lithium  
27 Ion batteries poisons the workers who make them. It is a dangerous product that is covered-  
28 up by the Obama Administration. Panasonic knows that these batteries are deadly.

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1 187.Tesla only exists to exploit Elon Musk's bribes. The lithium ion batteries blow  
2 up when they get: wet, hot, bumped, over-charged, struck by energy fields, exposed to air or  
3 squashed. Lithium ion batteries poison the Earth & that they poison & kill the workers that  
4 make them. Lithium ion batteries come from war profiteering in Afghan & Bolivian  
5 corruption

6 188.Panasonic is Elon Musk's partner. Panasonic is one of the most corrupt companies  
7 in the world. Panasonic has been charged, on multiple continents with: Product dumping,  
8 bribery, collusion, price fixing, anti-trust law violations, racketeering, worker abuse, toxic  
9 poisoning of workers, & other crimes. It is no wonder that Elon Musk & Panasonic are  
10 partners. Tata Motors executive Karl Slym was killed for exposing this fact.

11 189.Your tax dollars were stolen in order to make Tesla Motors, as part of a political  
12 financing kick-back scam. In other words, part of your paycheck was taken away from you  
13 in order to buy hookers, rent-boys & private jets for Musk & company.

14 190.Tesla's are forged in criminal corruption, so anybody who drives a Tesla must be  
15 either ignorant, a weasel or one of the corrupt. The whole world now knows all of the facts  
16 in this list so you can never plead ignorance to these crimes.

17 191.Tesla's have a huge amount of highly documented defects. The defects are so  
18 extensive that Tesla made buyers sign confidentiality agreements to try to hide how messed  
19 up their cars are.

20 192.Tesla's have killed more people than the main-stream news has reported. The full  
21 Tesla death-list is covered up.

22 193.Musk lied about why he wanted to make electric cars, when, in fact, he actually  
23 poisons the environment because Tesla investors wanted to exploit toxic minerals &  
24 materials which can't be recycled in a clean manner

25 194.No other electric car has been so mundane, & yet had so many problems with it,  
26 since the electric car was first sold in the 1800's. There is nothing "novel" or "amazing"  
27 about the Tesla aside from dime store parlor tricks for PR hype.

28 195.More drunks have crashed Tesla's, than any other per capita car in the world, per

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1 volume of cars made

2 196. Elon Musk's co-founders, investors, partners, wives, investors, suppliers &  
3 employees have sued him for being a fraud &, essentially, called him an "asshole" in court  
4 records.

5 197. Elon Musk lied on this Department of Energy funding application and the Obama  
6 Administration refuses to allow any federal employees or witnesses to testify to these facts  
7 in public due to the devastating potential results of these facts.

8 198. More owners of Tesla's have been found to cheat on their taxes, & be involved in  
9 abuse-based divorces, than almost any other car brand owner. Tesla owners are bad people  
10 who rationalize their poor life choices. Owning a Tesla is a red-flag for a tax audit!

11 199. Elon Musk will lie, cheat & steal in order to self-aggrandize & glorify his  
12 egotistical mania. Musk has been documented engaging in over 100 lies which were later  
13 proven to be false. He has spent tens of millions of dollars to buy fake news about himself  
14 on Twitter, Facebook & Google because he is such a mentally disturbed ego-maniac.

15 200. None of Elon Musk's companies would exist if not for taxpayer funded handouts  
16 given to him by corrupt politicians in exchange for illegal campaign finance deals with him  
17 & his investors.

18 201. Google, & Tesla, who are financial & political partners, have both been caught  
19 spying on consumers & manipulating Internet data in order to cover-up their complicity in  
20 huge political corruption & kick-back deals

21 202. Musk took U.S. taxpayer dollars from the government & then hired cheap off-shore  
22 labor & fired U.S. Union workers & domestic workers. He lied to & screwed the NUMMI  
23 workers that were working at the Fremont plant.

24 203. Musk has put over 18 surveillance devices in the Tesla. Anybody can hack those  
25 devices & monitor you. WORSE YET, foreign agents have hacked the Tesla & taken over  
26 the controls & driven Tesla's into bystanders & over cliffs.

27 204. When Erick Strickland was head of the NHTSA he was confronted about DOT  
28 safety cover-ups of the Tesla to protect Obama. He quit 48 hours later. The DOT safety

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1 cover-ups to protect the Obama campaign finance payola scheme continue to this day.  
2 Obama's Gibbs, Emanuel, Plouffe, Axelrod and Carney quit within a week of being  
3 threatened with exposure.

4 205. Elon Musk paid some of the largest bribes in the history of China, facilitated by  
5 Dianne Feinstein and her Chinese spy connections, in order to get his China factory opened.

6 206. Tesla's have had a large number of recalls but Elon Musk refuses to call them  
7 "recalls". Tesla's have had multiple recalls for SEVERE safety dangers. DOT has been told  
8 this, in writing, for years, but won't take action in order to protect Obama.

9 207. Elon Musk is a bullshit artist who has no original ideas & wears black-turtle neck  
10 shirts (like Elizabeth Holmes) to try to create a "cult" around himself & convince the world  
11 that he is a "Jesus-like" figure when, in fact, he is a clinical sociopath.

12 208. Tesla is a severe public safety hazard that has been systematically covered up by  
13 corrupt politicians.

14 209. Large numbers of Ex-CIA staff and In-Q-Tel spy staff work for Musk. Why does  
15 he need spies to build cars?

16 210. Tesla Motors batteries were promoted by those who wished to exploit the  
17 Afghanistan War for personal profit by controlling the Afghan lithium mining fields. Kleiner  
18 Perkins and Draper Fisher hyped the "...trillions of \$ of lithium in Afghanistan."

19 211. Tesla Motors batteries blow up on their own because their chemistry causes them to  
20 be naturally defective.

21 212. Tesla Motors batteries blow up when they get wet because their chemistry is  
22 activated by water to make them explode.

23 213. Tesla Motors batteries fires cannot be put out by any common fire-fighting  
24 resources.

25 214. Tesla Motors batteries set themselves on fire.

26 215. Per Federal MSDS disclosure documents, Tesla Motors batteries emit cancer-  
27 causing vapors when they burn.

28 216. Tesla Motors Vehicles toxicity poison bystanders, nearby vehicular passengers,

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1 airline passengers in planes carrying said batteries in their holds, & environments where  
2 such incidents occur.

3 217.Tesla Motors batteries blow up when bumped by the same level of car incident that  
4 would, otherwise, only dent a normal car bumper.

5 218.In an accident, when a Tesla rolls over, molten metal & plastic can drip on & burn  
6 the occupants alive.

7 219.Tesla has multiple sexual harassment and unsafe work-place lawsuits against the  
8 company.

9 220.Per MSDS documents, Tesla Motors batteries emit brain damaging chemicals when  
10 they burn

11 221.Tesla is a stock pumping scam to profiteering on stock market peak manipulation at  
12 the expense of taxpayers.

13 222.Per MSDS documents, Tesla Motors batteries emit chemicals, burning, or not, that  
14 can damage an unborn fetus within the mother

15 223.Per MSDS documents, Tesla Motors batteries emit chemicals that can cause lung  
16 damage.

17 224.Per MSDS documents, Tesla Motors batteries emit chemicals that can cause liver  
18 damage.

19 225.Per published lawsuits & news reports, the factories that make Tesla Motors  
20 batteries have been charged with the deaths, & potentially fatal illness, of over 1000 workers  
21 & the poisoning of nearby towns.

22 226.Tesla Motors batteries become even more dangerous over time, particularly when  
23 tasked by electric transportation systems like Hover-boards & Tesla's. The chemistry in a  
24 lithium ion battery changes to become more unstable over time.

25 227.Tesla Motors batteries were never designed to be used in automobiles. Tesla used  
26 non-automotive batteries in one of the most dangerous configurations possible.

27 228.Tesla Motors occupants experience higher EMF radiation exposure than gasoline  
28 vehicle occupants.

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1 229. Elon Musk's Space X vehicles & Tesla Motors vehicles have both had a higher-  
2 than-average number of explosions. This has caused outside experts to doubt Musk's ability  
3 to place safety considerations over his need for hyped-up PR.

4 230. Leaked Sandia National Labs & FAA research videos dramatically demonstrate the  
5 unstoppable, horrific, "re-percussive accelerating domino-effect" explosive fire effect of the  
6 Tesla Motors batteries.

7 231. Tesla's own "Superchargers" & home 3-prong chargers have set Tesla's, homes &  
8 businesses on fire

9 232. Consumer rights groups contacted Erick Strickland, the head of the NHTSA, &  
10 charged him with a cover-up. He quit days later. The NHTSA then issued a safety  
11 investigation request to Tesla Motors, which would have more publicly exposed these  
12 dangers, but the safety investigation was never under-taken due to White House requests &  
13 lobbyist bribes, from Tesla, which got the investigation shut down.

14 233. NEPA regulations for the Tesla NUMMI factory in California & the Nevada Tesla  
15 "Gigafactory" have been violated relative to environmental safety standards.

16 234. Tesla Motors vehicles are not "Factory Built" "like Ford" builds cars, as Tesla  
17 professes. They are hand built in small volumes & subjected to numerous defects. Blogs  
18 have documented hundreds of defects, as listed by Tesla owners. Tesla has lost at least one  
19 LEMON CAR LAWSUIT for defective manufacturing.

20 235. Tesla's "showrooms" are often "pop-up" retail storefronts that are in tight-proximity  
21 retail centers, putting it's neighbors at risk of total loss from fire damage.

22 236. Tesla Motors vehicles have been hacked & taken over. Their doors, steering,  
23 listening devices & navigation have been taken over by outside parties. Multiple Tesla have  
24 suddenly swerved off the road, over cliffs & into other vehicles, killing bystanders & Tesla  
25 drivers.

26 237. Three Tesla top engineers & two competing senior executives, all of whom had  
27 whistle-blown on Tesla, who were in perfect health one day, suddenly died mysteriously the  
28 next day.

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1 238. Multiple employees, founders, investors, marital partners, suppliers & others have  
2 sued Tesla Motors, &/or it's senior executives for fraud. Musk had nothing to do with  
3 creating Tesla. He ran a hostile take-over of Tesla from the founders.

4 239. In addition to suing him, many of his former staff & partners have described Musk  
5 as an "Arrogant Prick".

6 240. Main-Stream Media (MSM) have agreed not to provide news coverage of the  
7 deadly defects of the Tesla because the MSM are owned by the same politicians who own  
8 Tesla Motors. It is now legal to sue The New York Times for hiding these deadly defects,  
9 though, particularly if your family member was injured or killed because they covered-up  
10 the danger for political reasons.

11 241. If you think the above bullet-points are bad there are over a 1000 more. Find the  
12 book "Is Elon Musk A Fraud" online or visit <https://stopelonfromfailingagain.com/> ( PER  
13 THE WAYBACK MACHINE Internet Archive) or thousands of other sites that expose the  
14 truth about Musk & Tesla!

15 242. BANKRUPT MUSK – NO CASH FOR CRONY CORRUPTION. Print this out &  
16 freely re-post it on blogs & social media. Post this on bulletin boards. Put this on the  
17 windshield of every Tesla you find. Print this out & hand these out in front of every Tesla  
18 dealership: Nobody can stop you from handing these out, it is your U.S. Constitutional First  
19 Amendment Right! Pass the word! Plaintiffs are prepared to back up every single fact on  
20 here at any public meeting with the FBI, Congress, FTC, GAO, SEC or before a Federal  
21 Special Prosecutor.

22 243. The crash of a Tesla Model X through the home of South Korean singer and actor Ji  
23 Chang Son. The crash ended with the nose of the vehicle in Ji Chang Son's living room after  
24 the Tesla malfunctioned. Hundreds of such Tesla crashes have occurred, resulting in the  
25 deaths and injuries of Tesla owners, passengers, bystanders, oncoming drivers and others.

26 244. Following accusations by a Korean celebrity that a Tesla car spontaneously drove  
27 through a wall, the carmaker has replied that the crash was "entirely due to the man's  
28 horrible driving" in an ongoing effort, by Tesla, to steer the blame away from Tesla faulty

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1 engineering Actor and singer Son Ji-chang (identified as Ji Chang Son in court documents)  
2 claimed he was parking his Tesla Model X SUV when the vehicle suddenly [lurched forward](#)  
3 [into his living room](#) ( [https://www.facebook.com/photo.php?](https://www.facebook.com/photo.php?fbid=1169875899799830&set=pcb.1169910243129729&type=3&theater)  
4 [fbid=1169875899799830&set=pcb.1169910243129729&type=3&theater](https://www.facebook.com/photo.php?fbid=1169875899799830&set=pcb.1169910243129729&type=3&theater) ).

5 245.In a lawsuit filed last week in California, Son claimed that the crash was due to  
6 “sudden unintended acceleration” and sought class-action status with other Model X owners.  
7 In a nod to the car’s ability to sense and avoid crashes, the lawsuit also hinted that the Model  
8 X should not be allowed take actions that the car “knows will result in the collision with a  
9 fixed object.”

10 246.In June, another California-based Model X owner, Puzant Ozbag, similarly claimed  
11 that his Model X spontaneously accelerated through a parking lot and into a wall. A special  
12 prosecutor is needed to investigate Tesla due to the huge number of cover-ups, by Tesla and  
13 the Obama Administration, to protect campaign financier Elon Musk. Jeff Sessions needs to  
14 hire a [lawyer](#) from outside the [government](#) appointed by Sessions as [attorney general](#) or, in  
15 the United States, by [Congress](#) to investigate a government official for misconduct while in  
16 office. A reasoning for such an appointment is that the governmental branch or agency may  
17 have political connections to those it might be asked to investigate. Inherently, this creates a  
18 [conflict of interest](#) and a solution is to have someone from outside the department lead the  
19 investigation. The term "special prosecutor" may have a variety of meanings from one  
20 country to the next, from one government branch to the next within the same country, and  
21 within different agencies within each government branch. Critics of the use of special  
22 prosecutors argue that these investigators act as a "fourth branch" to the government because  
23 they are not subject to limitations in spending, nor do they have deadlines to meet.

24 247.Attorneys carrying out special prosecutor functions in either federal or state courts  
25 of the United States are typically appointed [ad hoc](#) with representation limited to one case or  
26 a delineated series of cases that implicate compelling governmental interests, such as: Fraud  
27 (SEC, Complex, Cybercrime, Mortgages), Public Corruption, Money Laundering & Asset  
28 Forfeiture, Civil Rights, Racketeering Across State lines, Environmental Protection,



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1 National Security, Tax & Bankruptcy, Organized Crime, or International cases where the US  
 2 is a party).[1] Special prosecutors in courts of the [United States](#) may either be appointed  
 3 formally by one of the three branches of government in a criminal proceeding, or when  
 4 dictated by federal law or regulation, or informally in civil proceedings, and also by one of  
 5 the three branches of government, or by a non-governmental entity to prosecute alleged  
 6 unlawful conduct by government agents. When appointed by the [judicial branch](#) to  
 7 investigate and, if justified, seek indictments in a particular judicial branch case, the attorney  
 8 is called special prosecutor.[2] When appointed/hired particularly by a governmental branch  
 9 or agency to investigate alleged misconduct within that branch or agency, the attorney is  
 10 called [independent counsel](#). [3] When appointed/hired by the state or political subdivision to  
 11 assist in a particular [judicial branch](#) case when the public interest so requires, the attorney is  
 12 called [special counsel](#). [3] When appointed/hired by an organization, corporation, person or  
 13 other non-governmental entity to investigate and, if justified, seek indictments against one or  
 14 more government officials for acts committed under color of law, the attorney may be called  
 15 [special counsel](#) or special prosecut. The term is sometimes used as a synonym for  
 16 [independent counsel](#), but under the former law authorizing the independent counsel, the  
 17 appointment was made by a special panel of the [United States Court of Appeals](#) for the  
 18 [District of Columbia Circuit](#). The [Ethics in Government Act](#) expired in 1999, and was  
 19 effectively replaced by [Department of Justice](#) regulation 28 CFR Part 600, under which  
 20 Special Counsel [Patrick Fitzgerald](#) was appointed to look into the [Plame affair](#). The Tesla  
 21 Motors and Elon Musk Case requires a Special Prosecutor.

22 248. [ELON MUSK AND TESLA FACE CRIMINAL FRAUD CHARGES BY FEDS!](#)  
 23 [MUSK FINALLY exposed!](#) ( [https://www.marketwatch.com/story/sec-sends-subpoena-to-](https://www.marketwatch.com/story/sec-sends-subpoena-to-tesla-in-probe-over-musk-tweets-2018-08-15-171034414)  
 24 [tesla-in-probe-over-musk-tweets-2018-08-15-171034414](https://www.marketwatch.com/story/sec-sends-subpoena-to-tesla-in-probe-over-musk-tweets-2018-08-15-171034414) )

25 249. [SEC subpoenas TESLA over Musk tweets...](#) ( [https://www.marketwatch.com/story/sec-sends-subpoena-to-tesla-in-probe-over-musk-](https://www.marketwatch.com/story/sec-sends-subpoena-to-tesla-in-probe-over-musk-tweets-2018-08-15-171034414)  
 26 [tweets-2018-08-15-171034414](https://www.marketwatch.com/story/sec-sends-subpoena-to-tesla-in-probe-over-musk-tweets-2018-08-15-171034414) )

27 250. [Whistleblower posts 'flawed cars' details...](#) (

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1 [https://www.cnbc.com/2018/08/15/tesla-whistleblower-tweets-details-about-flawed-cars-](https://www.cnbc.com/2018/08/15/tesla-whistleblower-tweets-details-about-flawed-cars-scrapped-parts.html)  
2 [scrapped-parts.html](https://www.cnbc.com/2018/08/15/tesla-whistleblower-tweets-details-about-flawed-cars-scrapped-parts.html) )

3 251. Elon Musk's Incredible Smoke And Mirrors Dance. Elon Musk's untraceable  
4 money laundering and political bribery scam has now been exposed. It is called an "Invisible  
5 Bridge". It is the way that covert funds move through a secret conduit of close associates and  
6 family members. Elon Musk is at the head of the conduit and his mother, brother and  
7 associates Tim Draper, Steve Jurvetson, and George Soros round out the other tentacles.  
8 With operational links through Wells Fargo Bank, Silicon Valley Bank and Goldman Sachs,  
9 the scheme is perfected corruption. The "bridge" uses a combination of fake tax evasion  
10 charities and business assets, passes through Senator's pockets and is never visible to the  
11 FBI, the FEC and the SEC unless they have very good agents assigned to the matter.

12 252.NTSB, DOJ, SEC and FEC have been blocked from action by DNC lobbyists.

13 253.The overt and arrogant Musk misdeeds have now become "obvious and RICO-  
14 violating..."

15 254.He is protected by Senators Reid, Harris, Pelosi and Feinstein. They are  
16 beneficiaries of the scam. Musk's self promoting, narcissistic, multi-billion dollar, self-  
17 aggrandizing PR hype. Elon Musk exists because he bribed DNC politicians including  
18 Obama, Clinton and Senators Feinstein, Reid, Boxer, Harris, Spier and Pelosi to give him  
19 free taxpayer cash and government resources from The U.S. Government and the California  
20 political tax pool. This is proven when you follow-the-money and the insider trading, stock  
21 ownership and crony payola kick-backs.

22 255.He is protected by the Clinton and Obama organizations along with most of the  
23 DNC. He finances these politicians via this scheme.

24 256.The U.S. Dept of Energy (GOVT) has been covering-up organized crime activities  
25 at GOVT in which GOVT funds are being used as a slush-fund to pay off DNC campaign  
26 financiers and to pay for Fusion-GPS attacks on Silicon Valley business competitors.

27 257.DNC campaign financiers and GOVT staff share stock market holdings with each  
28 other under family trusts, shell corporations and layered Goldman Sachs accounts. The deal

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1 was: Obama funds Tesla, Musk conduits campaign funds to Obama, top Obama staff profit  
2 off of insider Musk stocks.

3 258.Elon Musk is a criminal, a mobster, an asshole, a balding fake-hair wearing, plastic  
4 surgery-addicted, bi-sexual douchebag, woman-abusing, sex addicted, tax evader.

5 259.Musk exploits poor people and child slaves in the Congo and Afghanistan to mine  
6 his lithium and Cobalt. Look up this phrase on the top search engines: “child labor electric  
7 car batteries”

8 260.Musk spends billions per year to hire Russian trolls, fake blogger fan-boys and buy  
9 fake news self-glory look-at-me articles about himself. Musk thinks he is the 'Jesus' of  
10 Silicon Valley and he will do anything to make the public think so. Musk is insecure because  
11 his father was abusive and his “trophy wife” Mother is overbearing so he developed  
12 sociopath-like mental issues.

13 261.Musk has been professionally diagnosed as a 'psychotic narcissist.

14 262.Musk uses shell companies and trust funds to self-deal, evade the law and hide his  
15 bribes and stock market insider trading. His brother ran Solar City and is now under federal  
16 investigation for securities fraud.

17 263.A huge number of Tesla drivers, per capita, have been killed; pedestrians and  
18 oncoming drivers have also been killed, and Musk covers it up.

19 264.The DNC and the MSM refuse to allow any articles about Musk's crimes to be  
20 printed because they benefit from Musk's crimes.

21 265.VC’s Tim Draper and Steve Jurvetson are so fanatical about not being embarrassed  
22 from a Tesla bankruptcy that they will pump the TSLA stock and threaten anybody who  
23 might disclose the Musk misdeeds.

24 266.Peter Thiel, a Musk ‘boyfriend” also protects Musk. Musk, and his cronies, use  
25 Palantir, Google and related software to scan the entire internet every few minutes for any  
26 occurrence of the words: “Musk”, “Tesla” or “Tesla Fire”. They send trolls and fake  
27 bloggers (Many of them Russian) to put pro-Musk comments on the comments section of  
28 any blogs or articles discussing those topics and try to flood out the truth about Musk. In

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1 EVERY blog that you read that mentions 'Musk', at least 1/3 of the comments have been  
2 placed their by Musk's paid shills.

3 267. There are no "Tesla Fan Boys". All of the fanatic Tesla comments on the internet  
4 are Musk's, Thiel's, Jurvetson's and Draper's fake fanboy trolls. Musk, himself, stays up  
5 late at night pretending to be a 'Tesla Fan Boy' on blogs.

6 268. Main Stream DNC-biased News organizations who refuse to cover the story reveal  
7 themselves as shills for Musk

8 269. The Silicon Valley Mafia promotes Musk as a "Tech God" leader but, in reality  
9 Musk is the same kind of "Leader" as Charles Manson, Jim Jones, David Koresh, Swami  
10 Rajneesh and Al Capone.

11 270. His own people have sued him for fraud and lies once they realized that Musk-ism  
12 and Scientology had so much in common.

13 271. The 'Silicon Valley Mafia; cartel of frat boy sociopath venture capitalists like Steve  
14 Jurvetson, Tim Draper, Eric Schmidt, et al; threaten those who do not support the cult of  
15 Tesla or their political candidates.

16 272. Musk holds the Silicon Valley record for getting sued for fraud by his investors,  
17 wives, former partners, employees, suppliers and co-founders.

18 273. Elon Musk has gone out of his way to hire hundreds of ex-CIA and In-Q-Tel staff  
19 and assign them to "dirty tricks teams" to attack his competitors and elected officials who  
20 Musk hates.

21 274. Musk and his culture are being sued for abuse to women and blacks and the Unions  
22 hate him for lying to them.

23 275. <https://stopelonfromfailingagain.com> reveals even more Musk lies.

24 276. Musk never founded his companies. He took Tesla away from the founder: Marty,  
25 in a hostile take-over!

26 277. Musk's "Starlink" satellites are domestic spy and political manipulation tools -  
27 never get your internet from anything SpaceX has launched. SpaceX is entirely a domestic  
28 spy operation.

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1 278.Musk's "Mars" scheme is just a PR distraction to keep the news from looking too  
2 close at SpaceX domestic spying satellites.

3 279.The same kind of EMF radiation proven to cause cancer from cell phones exists in  
4 massive amounts in a Tesla.

5 280.Musk can't fix a car or build a rocket and has almost no mechanical skills.

6 281.If you pull a report of every VIN# of every Tesla ever built and cross reference that  
7 with insurance, repair and lawsuit records you will find that the "per volume" fire, crash,  
8 death and defect rate is THE WORST of any car maker in history! Musk's lobbyists have  
9 bribed DOT and NHTSA to stall safety inspections.

10 282.NO COMPLETE UNCOMPROMISING SAFETY REPORT ON TESLA CARS  
11 HAS EVER BEEN PUBLISHED but we have a copy of a hushed up report that would put  
12 Tesla out of business.

13 283.Musk's 'Autopilot' system is a scam to get government cash BUT IT NEVER  
14 WORKS. The Tesla 'Autopilot' has crashed into police cars, pedestrians, swamps and driven  
15 owners over cliffs.

16 284.Musk is a lying con artist and partners with Goldman Sachs to rig the stock market.  
17 Sachs has a dedicated team of 18 men who rig stocks and valuation bumps for Musk.

18 285.The "Silk Road" Cocaine and Murder-For-Hire website was created at Musk's  
19 SpaceX

20 286.Musk's In-Q-Tel staff ran two transport planes filled with drugs; listed as "Cocaine  
21 1" on FAA records.

22 287.Senators Dianne Feinstein, Harry Reid, Nancy Pelosi, Kamala Harris and their  
23 associates own the stock in Tesla Motors and/or it's suppliers and mining companies. That is  
24 why they criminally help cover-up investigations of Tesla!

25 288.All of this was reported, in writing, to James Comey, Patricia Rich and David  
26 Johnson at the FBI.

27 289.Tesla and Solyndra sit on the same land and share staff, contracts and lobbying.  
28 California politicians own parts of both companies.

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1 290.Musk took over Tesla Motors in a hostile take-over in order to exploit lithium,  
2 cobalt and other mining corruption deals for his business partners.

3 291.The 'lithium' in Musk's horrifically miss-engineered lithium ion batteries cause  
4 wars in the Congo over mining corruption.

5 292.Afghanistan and Bolivian mobsters benefit from the corrupt mining deals involved  
6 with mining lithium and cobalt for Elon Musk's batteries.

7 293.Elon Musk opened a factory in China to try to avoid American worker safety laws  
8 because all of the labor cheats and safety violations he had engaged in, in America, were  
9 catching up to him. He neglected to provide adequate worker safety to quarantine for the  
10 coronavirus, though.

11 294.Elon Musk's Lithium ion batteries are insider trading-owned by ex-CIA boss  
12 Woolsey and GOVT Boss Chu and they engaged in extreme conflict-of-interest to help  
13 Musk.

14 295.Elon Musk's Lithium ion batteries excrete chemicals that mutate fetuses when they  
15 burn.

16 296.Elon Musk's Lithium ion batteries destroy your brain, lungs and nervous system  
17 when they burn.

18 297.Elon Musk's Lithium ion batteries kill the factory workers who make them.

19 298.Elon Musk's Lithium ion batteries cause Panasonic to be one of the most corrupt  
20 companies in the world.

21 299.Elon Musk's Lithium ion batteries poison the Earth when disposed of.

22 300.Elon Musk's Lithium ion batteries can't be extinguished by firemen because water  
23 makes them explode even more and then explode again hours later.

24 301.Elon Musk's Lithium ion batteries have chemical dendrites and deposition massing  
25 issues (revealed by X-Ray analysis) which makes them more and more likely to explode as  
26 they age.

27 302.Elon Musk's Lithium ion batteries poison firemen when they burn.

28 303.Elon Musk's Lithium ion batteries are based on criminally corrupt mining schemes

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1 like URANIUM ONE.

2 304.Elton Musk's Lithium ion batteries have over 61 toxic chemicals in them.

3 305.Elton Musk's Lithium ion batteries come from an industry that spends billions on  
4 internet shills and trolls that they hire to nay say all other forms of energy

5 306.Elton Musk's Lithium ion batteries are insider-trading owned by corrupt U.S.  
6 Senators who are running a SAFETY COVER-UP about their dangers.

7 307.Apple products with lithium ion batteries have been exploding and setting people  
8 on fire.

9 308.Over time the chemical dendrites, or deposits, inside each battery grow worse and  
10 increase the chances of explosion as they age - LITHIUM ION BATTERIES BECOME  
11 MORE AND MORE LIKELY TO EXPLODE AS TIME GOES ON AND AS THEY AGE.  
12 This is not a theory. This is a scientific fact. That is why you hear about more and more  
13 lithium batteries catching fire and blowing up. Additionally, scientists also speculate that the  
14 increasing presence of low energy nuclear background energy and wifi energy in the  
15 environment is making lithium ion batteries explode more often lately. This is upheld by the  
16 increasing number of FAA reports about commercial airline cabins suddenly “filling up with  
17 toxic smoke” as some lithium ion battery explodes in someones overhead luggage. As  
18 commercial jets go higher they lose the protection of the atmosphere and are subjected to  
19 more gamma (and other) radiation from overhead. This makes the already unstable lithium  
20 ion batteries on board blow up.

21 309.Tesla owner's had had more DUI's, abuse filings in divorce proceedings and crashes  
22 than any other car maker PER VOLUME. This makes Tesla the #1 car for douche bags and  
23 scummy people.

24 310.Tesla's own federal patent filing records confirm that Tesla batteries are as  
25 dangerous as this document reports.

26 311.Political activist George Soros owns part of Tesla Motors so that Soros can help  
27 conduit DNC cash.

28 312.The Obama Administration promised Silicon Valley oligarchs the market

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1 monopoly on lithium ion batteries and the sabotage of fuel cells in exchange for campaign  
2 financing and search engine rigging.

3 313.United States Senators that are supposed to protect us from these deadly products  
4 own the stock market assets of them so they protect them and stop the FDA, OSHA, DOT &  
5 NHTSA from outlawing them.

6 314.There have been thousands of defect reports filed on Tesla cars.

7 315.Tom Steyer is a notorious DNC financier. His partner, Margaret Sullivan ran, the  
8 federal USAID agency, USAID sent all of the DNC campaign financiers in Silicon Valley a  
9 federal 'report' from USAID that said there was "A TRILLION DOLLARS OF LITHIUM  
10 IN AFGHANISTAN" and promised to give those lithium mines, EXCLUSIVELY, to the  
11 Silicon Valley venture capitalists if they funded and web search manipulated the election for  
12 Obama to take over the White House. Plaintiffs have the documents proving this. In other  
13 words, a re-up of the Afghan War was caused by Elon Musk and it killed American soldiers  
14 so that Musk could buy more mansions and trophy wives.

15 316.If a Tesla battery gets wet it will explode and cause all of the other batteries to  
16 explode in a "cascade of explosions".

17 317.Water makes Tesla batteries explode.

18 318.In an accident, when a Tesla rolls over, molten metal & plastic can drip on & burn  
19 the occupants alive and seal them in molten metal.

20 319.Alkaline, NiCAD and hundreds of other battery chemistry DO NOT have all of  
21 these problems but Lithium Ion batteries get a monopoly because of politician insider  
22 trading owner-ships.

23 320.Tesla Motors has caused far more deaths and injuries than the world generally  
24 knows about.

25 321.A recent fire on U.S. Highway 101 near Mountain View, CA, burned the driver  
26 alive and killed him.

27 322.In Florida two kids died in a Tesla, burned alive, screaming in agony.

28 323.A man died in agony in a Tesla crash in Malibu that set Malibu Canyon on fire.



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1 324.A young woman, at the start of life, and her boyfriend were burned alive in their  
2 crashed Tesla.

3 325.There are many more deaths and crashes than you have seen in the Main Stream  
4 News (MSN) The deaths and the cover-ups are endless.

5 326.Senators Dianne Feinstein, Harry Reid, Nancy Pelosi, Kamala Harris and their  
6 associates own the stock in Tesla Motors and/or it's suppliers and mining companies and  
7 they cover-up and halt investigations and laws designed to save the public.

8 327.Elon Musk's Lithium ion battery partners spend over \$1B a year to shill and troll  
9 hype about lithium ion batteries and cover-up the dangers.

10 328.Lithium ion EVs are more prone to battery fires.

11 329.experts say that their lithium-ion batteries can fuel hotter fires that release toxic  
12 fumes and are more difficult to put out. Lithium ion fires keep reigniting which explains  
13 why it takes so long and requires copious amounts of water or foam (it is an electric fire,  
14 after all) to smother the flames.

15 330.Tesla employee Bernard Tse and his team warned Elon Musk about these dangers  
16 in 2008 and they got fired and/or warned to "say nothing" by Musk.

17 331.Three top Tesla engineers died in a plane crash next to Tesla offices in San Carlos  
18 after two of them agreed to become whistle-blowers. Another whistle-blower has suggested  
19 they were killed in a "Boston Brakes" hit-job.

20 332.The DNC bosses, Congress people and federal executives own the stock in lithium,  
21 Solar and EV markets and use kickbacks from those markets (Especially via convoluted  
22 campaign finance laundering via Elon Musk) to finance the DNC.

23 333.The DNC bosses and Musk use character assassination as their main political tool  
24 against any member of the public who speaks out against their felony stock market scams  
25 and PizzaGate-like scandals. The Harvey Weinstein reports by Ronan Farrow show that they  
26 have teams of hired goons that they pay to destroy people's lives.

27 334.Musk uses Black Cube, Mossad, In-Q-Tel, Stratfor, Gawker Media, Gizmodo  
28 Media, Media Matters, David Brock, Sid Blumenthal, NY Times, Google servers, Facebook

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1 servers, Podesta Group, Perkins Coie, Covington & Burling and a host of "media assassins".

2 335.Musk buddies: Gawker and Gizmodo Media set-up the attack stories and, in paid  
3 partnership with Google, Google kicks their attack links around the globe, in front of 8  
4 Billion people, forever. Google locks the attack articles of its enemies on the front top search  
5 results of Google search results forever, on purpose! Google and Musk are partners-in-  
6 crime.

7 336.Larry Page steals technology for Google and Musk meets with Larry Page to advise  
8 him on which technologies to steal and how to bypass FEC laws.

9 337.Musk has exceeded FEC campaign finance limits by billions of dollars via "in-  
10 kind" services.

11 338.Had the full scope of these facts been acted on during the Obama Administration,  
12 Barack Obama would have become the first modern sitting President to have been arrested  
13 in the White House. Barack Obama was fully aware of these schemes, crony payola deals  
14 and corruption crimes and discussed the implementation of these crimes, daily, with Rahm  
15 Emanuel, David Plouffe, Steven Rattner, Robert Gibbs, John Podesta, David Axelrod, Eric  
16 Holder and Jay Carney in the Oval Office.

17 339.THIS corruption involves TRILLIONS of dollars of corrupt mining deals,  
18 automotive and energy monopolies!

19 340.THIS is why the federal budget analysis reports are showing TRILLIONS of dollars  
20 of 'untraceable' losses from the United States Treasury from 2006 up to today!

21 341.THIS is why a large number of reporters, whistle-blowers and prosecutors  
22 suddenly, and mysteriously turned up dead!

23 342.The company that Elon Musk built to usher in the electric-car future might not have  
24 enough cash to make it through the calendar year without stock markets scams being used to  
25 keep it alive.

26 343.Tesla again fell far short of its own production targets for the mass-market Model 3  
27 sedan

28 344. Another person died in a crash involving its assisted-driving feature.

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1 345.Musk entered into a public dispute with federal safety regulators.

2 346.Tesla's once high-flying stock, buffeted by a downgrade from credit analysts, has  
3 dropped 24 percent from its peak in September but Silicon Valley Vc's will pump it up to  
4 save face.

5 347.No one has raised or spent money the way Elon Musk has; Nor has any other chief  
6 executive officer of a public company made a bankruptcy joke on Twitter at a time when so  
7 much seemed to be unraveling.

8 348.Tesla is going through money so fast that, without additional financing, there is  
9 now a genuine risk that the 15-year-old company could run out of cash in 2018. The  
10 company burns through more than \$6,500 every minute, according to data compiled by  
11 Bloomberg. Free cash flow—the amount of cash a company generates after accounting for  
12 capital expenditures—has been negative for five consecutive quarters. That will be a key  
13 figure to watch when Tesla reports earnings May 2. Read the full story here:

14 <https://www.bloomberg.com/graphics/2018-tesla-burns-cash/>

15 349.In years to come, we will all look back and wonder how so many people were taken  
16 in by this shyster, who makes Enron look honest.

17 350.One of Tesla's greatest strengths is its ability to monetize the patience and goodwill  
18 of its customers and loyal fans. The company is sitting on a staggering \$854 million in  
19 customer deposits as of the end of 2017.

20 351.Since Tesla sells its products direct to consumers, without relying on a dealer  
21 network, customer deposits are cash payments that essentially serve as interest-free loans—  
22 and these loans can stretch on for years. If Tesla were to go bankrupt, those deposit holders  
23 would likely be wiped out.

24 352.Tesla is holding customer deposits for two vehicles that aren't even in production  
25 yet: an electric Tesla Semi (\$20,000 deposit) and a next-generation Roadster (either \$50,000  
26 down or the \$250,000 retail price paid up front to reserve a limited edition). Even customers  
27 interested in installing an array of solar roof panels or the company's Powerwall home  
28 battery must hand over \$1,000 to place an order.

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1 353.Tesla doesn't break out deposit numbers by car, but the vast majority comes from  
2 \$1,000 reservations for the Model 3. When Musk first introduced the lower-priced sedan in  
3 March 2016, fans stood in long lines at Tesla stores. Two years later, the slower-than-  
4 expected pace of production means that most of the more than 400,000 reservation holders  
5 are still waiting. And new people appear to be joining the queue: As of April, the company  
6 reported "net Model 3 reservations remained stable."

7 354.There's an additional source of free money from loyal believers: An unknown  
8 number of customers have paid up for vehicle features—\$3,000 for "Full Self Driving"  
9 capability, for example—that Tesla thus far hasn't figured out or released to anyone.

10 355.Elon Musk cooked the books by emailing interested sales prospects and asked them  
11 to put a deposit down before each quarter ended so he could book their tiny deposits as fully  
12 transacted \$60K+ "sales" before each quarter closed.

13 356.Elon Musk and SpaceX are being sued by multiple employees for "lying about  
14 safety standards, safety records" and deadly safety defects.

15 357.The Elon Musk Tesla Money Laundering Board Of Directors is as full of fraud and  
16 corruption as Musk. Birds of a feather stick together and the Jurvetson, Draper, Musk, et al;  
17 clan of corruption runs deep. The Board of Directors can't operate their scam without the  
18 whole pack of thieves and liars in place. An outsider will break theirs swamp of tax evasion,  
19 Dark Money political bribes, off-shore cash, self-dealing, book-cooking, real estate fraud,  
20 expense padding and other nefarious deeds.

21 358.Dianne Feinstein's family member: Herb Newman of Sausalito, California's HR  
22 firm: Newman Search (415 332-8425) has a company as of 1972 with the sole purpose of  
23 setting up investment bank deals with the People's Republic of China. Feinstein arranged for  
24 Newman to provide the staffing for Tesla and Solyndra. Dianne Feinstein has been under  
25 investigation for spy activities with China and her senior aide was arrested as a Chinese top  
26 spy. In 1973 Mr. Newman arrived in Canton at the invitation of the Chinese Council for the  
27 Promotion of International Trade. (CCPIT). He and his company MVTC were one of fifty  
28 businesses to be invited to the Canton Trade Fair held in Kwangchow China. In 1978 Mr.

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1 Newman founded China Investments and in partnership with California Trade Delegations  
2 both companies as members of the San Francisco Chamber of Commerce began taking US  
3 Corporations to China. Mr. Newman along with one of his associates at the time Mr. Darryl  
4 Schoon helped organize Senator Dianne Feinstein's first trip to China in conjunction with the  
5 San Francisco Chamber of Commerce. Herb Newman, Mart Bailey and Feinstein's Husband;  
6 Dick Blum are on intelligence agency watch-lists, and under electronic surveillance, for  
7 potentially corrupt deals with China, Tesla and Solyndra.

8 359.Dianne Feinstein's husband owns CBRE which owns the real estate contracts for  
9 both Tesla and Solyndra.

10 360.Dianne Feinstein's family owns interests in the construction companies hired by  
11 both Tesla and Solyndra.

12 361.Dianne Feinstein had her staff warn other California businesses away from using  
13 the NUMMI car factory in order to protect the real estate deal for both Tesla and CBRE,  
14 which is owned by her husband.

15 362.Tesla began real estate deals in multiple states and then canceled them at the last  
16 minute, which got them sued for fraud and charged with "lying" to different communities.  
17 They started, and then pulled out of these different building (San Jose, Southern California,  
18 New Mexico, Etc.) deals, because CBRE and Feinstein were trying to leverage real estate  
19 profit exploitation using taxpayer funding.

20 363.Panasonic and Tesla have known for decades that the Panasonic 18650 batteries  
21 used in the Tesla suffer from multiple chemistry degradation defects which will almost  
22 always make them eventually explode or "go thermal". The defects include: 1.) LENR  
23 activation, 2.) Dendrite lengthening, 3.) Particle congealing, 4.) Chemistry evolution and  
24 other defects. The Tesla projects is, essentially, a failed product product dumping effort of a  
25 failed and dangerous battery product.

26 364.Elon Musk has demanded that his employees sign "loyalty pledges", "vows" and  
27 engage in Omerta's in order to keep the corruption details of Tesla from being exposed to the  
28 public.

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1 365.Tesla insider Antonio Gracias is the mob boss insider at Tesla who arranges media  
2 hit-jobs on those who displease Musk.

3 366.The NHTSB has issued requests to Tesla for safety tests and data that Tesla never  
4 complied with. Instead, Tesla paid bribes, which were referred to as "fees" to avoid having  
5 to complete those tests. An independent group of outside investigators issued a damning  
6 safety report to the NHTSB demanding that Tesla be compelled to produce the safety tests in  
7 2010 but Obama appointed NHTSB executives buried the report and protected Tesla in order  
8 to keep the connection between Obama's funding and Tesla protected. NHTSB boss:  
9 Strickland, an Obama insider, was confronted with this in Washington, DC and resigned  
10 from his job 48 hours later. NHTSB has still not acted on the severe Tesla safety defects that  
11 have been reported since 2009.

12 367.An SEC investigation of Musk uncovered horrific evidence of Musk corruption but  
13 the SEC could not report or act on it because Obama congressional bosses and lobbyists got  
14 the SEC investigation "limited" to only examine a single Twitter "Tweet" from Musk.

15 368.Elon Musk is protected by top DOJ, SEC, CFTC, FEC and other Obama left-over  
16 staff as well as 45 U.S. Senators and top Federal Reserve members and Goldman Sachs, who  
17 live in terror that exposure of the entire Elon Musk financial food-chain will topple the entire  
18 DNC Dark Money payola scam. This is the reason that Tesla can get away with so much  
19 obvious and overt corruption and still continue operations. Tesla Motors book-cooking,  
20 financial frauds and political payola conduits, if fully revealed, would change the course of  
21 political influence in America.

22 369.Elon Musk has been sued by a man that Musk called a "Pedo", yet Musk's own  
23 father has been accused of child sex abuse, racism and, indeed, got his own daughter  
24 pregnant!

25 370.Elon Musk's mother has been accused of being a "self-indulgent trophy wife" who  
26 Musk was trained by to be an arrogant elitist. Her hatred of black people was imbued on  
27 Musk who has been sued by black people at his company for "running a racist culture".

28 371.Elon Musk divorced the same woman twice because she knew his dirty little secret

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1 and threatened to out him if he did not keep the deal going. She was hired to "act" as his  
2 wife.

3 372. Musical artist Iggy Azalea was at a Musk Party, with other friends, who captured  
4 Elon Musk on video on drugs and in weird sex acts. Musk had Iggy's camera stolen at the  
5 party to hie the evidence but he did not get the other cameras and did not realize that some of  
6 those cameras placed their images and videos directly on the Cloud, where hackers acquired  
7 them.

8 373. With cover-up help from Eric Holder, Steven Chu, Obama, Valarie Jarret, DNC  
9 FBI agents, Perkins Coie, Covington and Burling, Wilson Sonsini, etc; sociopath Musk  
10 actually believes he is "untouchable" and that he can get away with anything. His downfall  
11 will be the same downfall of every narcissist sociopath oligarch throughout all of recorded  
12 history.

13 374. Elon Musk is a drug addict. A simple urine and blood test proves it. Musk's  
14 downfall and the downfall of John DeLorean are seeming to align.

15 375. Dianne Feinstein and Nancy Pelosi are violating the law protecting Tesla by  
16 withholding investigations and prosecutions? Why are they allowing American citizens to  
17 continue to die from the 1.) "sudden acceleration electronics defect"; 2.) "The failed Auto-  
18 pilot electronics defect" 3.) "The deteriorating and deadly lithium ion batteries" and 4.)  
19 numerous other defects widely documented in the news media and filed lawsuits?

20 376. Elon Musk exists because he bribed DNC politicians including Obama, Clinton and  
21 Senators Feinstein, Reid, Boxer, Harris, Spier and Pelosi to give him free taxpayer cash and  
22 government resources. This is proven when you follow-the-money and the insider trading,  
23 stock ownership and crony payola kick-backs.

24 377. The Energy Dept (GOVT) has been covering-up organized crime activities at  
25 GOVT in which GOVT funds are being used as a slush-fund to pay off DNC campaign  
26 financiers and to pay for CIA/GPS Fusion-Class attacks on Silicon Valley business  
27 competitors.

28 378. DNC campaign financiers and GOVT staff share stock market holdings with each

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1 other under family trusts, shell corporations and layered Goldman Sachs accounts. The deal  
2 was: Obama funds Tesla, Musk conduits campaign funds to Obama, top Obama staff profit  
3 off of insider Musk stocks.

4 379.Musk exploits poor people and child slaves in the Congo and Afghanistan to mine  
5 his lithium and Cobalt. Look up this phrase on the top search engines: "child labor electric  
6 car batteries".

7 380.The Silicon Valley Paypal Mafia promotes Musk as a "Tech God" leader but, in  
8 reality Musk is the same kind of "Leader" as Charles Manson, Jim Jones, David Koresh,  
9 Swami Rajneesh and Al Capone. His own people have sued him for fraud and lies once they  
10 realized that Musk-ism and Scientology had so much in common.

11 381.Musk holds the record for getting sued for fraud by his investors, wives, former  
12 partners, employees, suppliers and co-founders. Elon Musk has gone out of his way to hire  
13 hundreds of ex-CIA and In-Q-Tel staff and assign them to "dirty tricks teams" to attack his  
14 competitors and elected officials who Musk hates.

15 382.Musk and his culture are being sued for abuse to women and blacks and the Unions  
16 hate him for lying to them. <https://stopelonfromfailingagain.com> ( PER THE WAYBACK  
17 MACHINE Internet Archive) reveals even more Musk lies.

18 383.THIS corruption is what all of the big political scandals are about today!

19 384.THIS corruption involves TRILLIONS of dollars of corrupt mining deals,  
20 automotive and energy monopolies!

21 385.THIS is why the federal budget analysis reports are showing TRILLIONS of dollars  
22 of 'untraceable' losses from the United States Treasury from 2006 up to today!

23 386.THIS is why a large number of reporters, whistle-blowers and prosecutors  
24 suddenly, and mysteriously turned up dead!

25 387.THIS can all be proven in jury trial and in live televised Congressional hearings!

26 388.This is all being covered up because top State and Federal officials are in on it, own  
27 the stock in it and are so deeply involved in it that they could go to Federal prison when this  
28 all comes out.



389. The anxieties that lurk beneath the tremendous ambition of Tesla Inc. moved into the forefront in recent weeks. The company again **fell far short** ( <https://www.bloomberg.com/news/articles/2018-04-03/tesla-model-3-output-misses-forecast-as-musk-promises-progress> ) of its own production targets for the mass-market Model 3 sedan, another person **died in a crash** ( <https://www.bloomberg.com/news/articles/2018-03-31/tesla-says-driver-s-hands-weren-t-on-wheel-at-time-of-accident> ) involving its assisted-driving feature and Musk entered into **a public dispute** ( <https://www.bloomberg.com/news/articles/2018-04-12/tesla-withdraws-from-ntsb-crash-probe-over-autopilot-data-flap> ) with federal safety regulators. Tesla's once high-flying stock, buffeted by a downgrade from credit analysts, has dropped 24 percent from its peak in September.

390. There's a good reason to worry: No one has raised or spent money the way Elon Musk has. Nor has any other chief executive officer of a public company made a **bankruptcy joke** ( <https://twitter.com/elonmusk/status/980566101124722688> ) on Twitter at a time when so much seemed to be unraveling.

391. Tesla is going through money so fast that, without additional financing, there is now a genuine risk that the 15-year-old company could run out of cash in 2018. The company burns through more than \$6,500 every minute, according to [data compiled by Bloomberg](https://notalotofpeopleknowthat.wordpress.com/2018/05/01/tesla-burning-cash/#methods) ( <https://notalotofpeopleknowthat.wordpress.com/2018/05/01/tesla-burning-cash/#methods> ). Free cash flow—the amount of cash a company generates after accounting for capital expenditures—has been negative for five consecutive quarters. That will be a key figure to watch when Tesla reports earnings May 2. Read the full story here: <https://www.bloomberg.com/graphics/2018-tesla-burns-cash/>

392. In years to come, we will all look back and wonder how so many people were taken in by this shyster, who makes Enron look honest. A

393. lot of Musk's money has been extracted from suckers, who think he is God's gift, as Bloomberg reports: One of Tesla's greatest strengths is its ability to monetize the patience and goodwill of its customers and loyal fans. The company is sitting on a staggering \$854

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1 million in customer deposits as of the end of 2017.

2 394. Since Tesla sells its products direct to consumers, without relying on a dealer  
3 network, customer deposits are cash payments that essentially serve as interest-free loans—  
4 and these loans can stretch on for years. If Tesla were to go bankrupt, those deposit holders  
5 would likely be wiped out.

6 395. Tesla is holding customer deposits for two vehicles that aren't even in production  
7 yet: an electric Tesla Semi (\$20,000 deposit) and a next-generation Roadster (either \$50,000  
8 down or the \$250,000 retail price paid up front to reserve a limited edition). Even customers  
9 interested in installing an array of solar roof panels or the company's Powerwall home  
10 battery must hand over \$1,000 to place an order.

11 396. Tesla doesn't break out deposit numbers by car, but the vast majority comes from  
12 \$1,000 reservations for the Model 3. When Musk first introduced the lower-priced sedan in  
13 March 2016, fans stood in long lines at Tesla stores. Two years later, the [slower-than-  
14 expected pace of production](https://www.bloomberg.com/graphics/2018-tesla-tracker/) ( <https://www.bloomberg.com/graphics/2018-tesla-tracker/> )  
15 means that most of the more than 400,000 reservation holders are still waiting. And new  
16 people appear to be joining the queue: As of April, the company reported “net Model 3  
17 reservations remained stable.”

18 397. There's an additional source of free money from loyal believers: An unknown  
19 number of customers have paid up for vehicle features—\$3,000 for “Full Self Driving”  
20 capability, for example—that Tesla thus far hasn't figured out or released to anyone.

21 398. The consumer psychology that sees hundreds of thousands of people essentially  
22 extending an interest-free loan to a public company is unusual, to say the least. I think the  
23 phrase “more money than sense” rather sums it up

24 399. Apple and Google also named in US lawsuit over Congolese child cobalt mining  
25 deaths for Elon Musk's Tesla Cars. Dell, Microsoft and Tesla also among tech firms named  
26 in case brought by families of children killed or injured while mining in DRC. [I saw the  
27 unbearable grief inflicted on families by cobalt mining. \(](https://www.theguardian.com/global-development/commentisfree/2019/dec/16/i-saw-the-unbearable-grief-inflicted-on-families-by-cobalt-mining.)  
28 [https://www.theguardian.com/global-development/commentisfree/2019/dec/16/i-saw-the-](https://www.theguardian.com/global-development/commentisfree/2019/dec/16/i-saw-the-unbearable-grief-inflicted-on-families-by-cobalt-mining.)

1 [unbearable-grief-inflicted-on-families-by-cobalt-mining-i-pray-for-change](#) ) I pray for chan  
2 [Elon Musk's cobalt](#) extraction in DRC has been linked to child labour.

3 400.A landmark legal case has been launched against the world's largest tech  
4 companies by Congolese families who say their children were killed or maimed while  
5 mining for cobalt used to power smartphones, laptops and electric cars, the Guardian can  
6 reveal.

7 401.Apple, Google, Dell, Microsoft and Tesla have been named as defendants [in a](#)  
8 [lawsuit filed](#) in ( [http://iradvocates.org/sites/iradvocates.org/files/stamped%20-](http://iradvocates.org/sites/iradvocates.org/files/stamped%20-Complaint.pdf)  
9 [Complaint.pdf](#) )Washington DC by human rights firm [International Rights Advocates](#) ( <http://www.iradvocates.org/> ) on behalf of 14 parents and children from the Democratic  
10 Republic of the Congo (DRC). The lawsuit accuses the companies of aiding and abetting in  
11 the death and serious injury of children who they claim were working in cobalt mines in  
12 their supply chain.

13 402.The lawsuit argues that Apple, Google, Dell, Microsoft and Tesla all aided and  
14 abetted the mining companies that profited from the labour of children who were forced to  
15 work in dangerous conditions – conditions that ultimately [led to death](#) ( [https://www.theguardian.com/global-development/commentisfree/2019/dec/16/i-saw-the-](https://www.theguardian.com/global-development/commentisfree/2019/dec/16/i-saw-the-unbearable-grief-inflicted-on-families-by-cobalt-mining-i-pray-for-change)  
16 [unbearable-grief-inflicted-on-families-by-cobalt-mining-i-pray-for-change](#) ) and serious  
17 injury. The families argue in the claim that their children were working illegally at mines  
18 owned by UK mining company Glencore. The court papers allege that cobalt from the  
19 Glencore-owned mines is sold to Umicore, a Brussels-based metal and mining trader, which  
20 then sells battery-grade cobalt to Apple, [Google](#) ( <https://www.theguardian.com/technology/google> ) , Tesla, Microsoft and Dell.

21 403.Other Plaintiffs in the court documents say they worked at mines owned by  
22 Zhejiang Huayou Cobalt, a major Chinese cobalt firm, which the lawsuit claims supplies  
23 [Apple](#) ( <https://www.theguardian.com/technology/apple> ), Dell, and Microsoft and is likely  
24 to supply the other defendants.

25 404.Another child, referred to as John GOVT 1, says that he started working in the  
26  
27  
28

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1 mines when he was nine. The lawsuit claims that earlier this year, he was working as a  
2 human mule for Kamoto Copper Company, carrying bags of cobalt rocks for \$0.75 a day,  
3 when he fell into a tunnel. After he was dragged out of the tunnel by fellow workers, he says  
4 he was left alone on the ground at the mining site until his parents heard about the accident  
5 and arrived to help him. He is now paralysed from the chest down and will never walk again.

6 405. Other families included in the claim say that their children were killed in tunnel  
7 collapses or suffered serious injuries such as smashed limbs and broken spines while  
8 crawling through tunnels or carrying heavy loads. The families say that none were paid any  
9 compensation for the deaths and injuries.

10 406. One of the central allegations in the lawsuit is that Apple, Google, Dell, Microsoft  
11 and [Tesla](https://www.theguardian.com/technology/tesla) ( <https://www.theguardian.com/technology/tesla> ) were aware and had “specific  
12 knowledge” that the cobalt they use in their products is linked to child labour performed in  
13 hazardous conditions, and were complicit in the forced labour of the children

14 407. It is charged that the Musk empire is an organized crime program that exists  
15 between Silicon Valley tech oligarchs, investment banks, U.S. Senators, government agency  
16 staff and White House staff who engage in these crimes.

17 408. That public officials knowingly participate in these crimes by failing to report their  
18 associates who engage in these illicit actions and by hiring suppliers who operate these illicit  
19 activities.

20 409. That the Musk empire suspects manipulate government funds for their personal  
21 profiteering at the expense of domestic citizen taxpayers like us.

22 410. That the Musk empire suspects operate a vast stock market manipulation program,  
23 as a core function of their operations, and those illicit deeds function at the expense of the  
24 public to render unjust gain to public officials.

25 411. That the Musk empire suspects contract a known group of lobbyists, corrupt law  
26 firms, unethical CPA's, corrupt investment banks and specialized corruption services  
27 providers to attack, defame, physically harm, character assassinate, black-list and/or kill  
28 those they dislike and they harmed many persons with those acts.

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1 412.That the Musk empire suspects operate an Epstein-like sex-trafficking network of  
2 prostitutes and sexual extortion activities and locations for the engagement of said activities  
3 and for the bribery of cohorts via sex workers and that Musk was a personal associate of  
4 Jeffrey Epstein.

5 413.That the Musk empire suspects engage in electronic attacks and manipulations  
6 including hacking, election manipulation, media censorship and internet search results  
7 manipulation in order to mask their schemes.

8 414.That the Musk empire suspects engage in Lois Lerner-like, SPYGATE-like, VA  
9 whistleblower-like reprisal and retribution attacks using government agencies like SSA,  
10 DOJ, FBI, LSC, HUD, HHS, GOVT, Etc

11 415.It is demanded that Elon Musk be arrested on RICO Racketeering, Anti-Trust, Tax  
12 Evasion, Bribery, and related charges!

13 416.Elon Musk had sex with a young non-age-appropriate rock and roll girl and got her  
14 pregnant.

15 417.Elon Musk dated anal sex advocate Gwenyth Paltrow who later told her friends that  
16 he was full of shit.

17 418.Elon Musk divorced one actress, then had to remarry her because she had the goods  
18 on him.

19 419.Video exists of Elon Musk at various sex parties.

20 420.Elon Musk dated Johnny Depp's girlfriend Amber Heard who thought that Musk  
21 was even more controlling than Johnny Depp.

22 421.The NUMMI car factory that Musk took over was first called, by Musk, in the  
23 media "non-functional". Even the two major car makers that were using it had abandoned it.  
24 Feinstein make Musk take it because here husband's company: CBRE Realty, managed the  
25 property around it.

26 422.Musk never made good on his promises to NUMMI workers or the Unions  
27 representing the NUMMI factory.

28 423.After getting an insane amount of exclusive free cash from the taxpayers, Musk

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1 flew workers in from overseas.

2 424.Multiple women have charged Musk for sexual abuse and factory misogyny.

3 425.Musk couldn't make it in college and bailed out.

4 426.Far more SpaceX rockets have exploded and fully failed than the public is aware of.

5 427.Musk said he would already have sent his buddies around the moon but many  
6 potential passengers have bailed out after they saw the due diligence on SpaceX lack of  
7 experience.

8 428.Musk, Draper, Page, Westly, Schmidt, Brin and other famous tech asshole  
9 billionaires have formally agreed to run a "cartel" to control news, information and  
10 industries.

11 429.Inside the Tesla that Elon Musk had SpaceX put in orbit is a "confession folder"  
12 that would destroy Musk if anyone went up and got it.

13 430.Elon Musk believes he could kill someone and not get in trouble because he has so  
14 many California Senator's, Tier one law firms and former White House staff protecting him.

15 431.Elon Musk is the Citizen Kane of the modern world. He thinks he is the Al Capone  
16 of Technology. He uses things that appear to be all "crunchy granola" on the surface to steal  
17 taxpayer subsidies with the help of corrupt politicians.

18 432.Aside from Musk's own personal dirty operations and orders, the largest facilitator  
19 of his crimes is the large group of men inside Goldman Sachs and JP Morgan dedicated to  
20 supporting his crimes and corruptions.

21 433.Through covert conduits, Elon Musk pays blogger James Ayre to shill is schemes  
22 online.

23 434.Musk's entire media plan is self-promotional aggrandizing and fake virtue-signaling  
24 to keep the news off his case.

25 435.The SEC made him quit but he just changed one letterhead graphic and nothing  
26 else. Musk still runs Tesla and the rest of the empire just like he always did.

27 436.Musk covertly funds abortion projects because he gets so many girls pregnant and  
28 refuses to use a condom.

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1 437.Deutsche Bank is the other biggest player in the Musk Empire money laundering,  
2 political payola and corruption crimes.

3 438.Musk stole most of his designs from others, as proven by the U.S. Patent office and  
4 previous publications.

5 439.When Elon Musk's Hyper-loop crashes, it will turn all of the passengers into a  
6 bloody applesauce like nightmare.

7 440.Musk's 5G SpaceX Starlink Satellites could destroy the environment, will add to  
8 the cancer-causing radiation of the Earth and are to be used to spy on consumer's uses of the  
9 internet.

10 441.In lawsuits, Musk always pleads that he "has no money".

11 442.X-Ray analysis by over 40 major laboratories prove that Elon Musk's lithium ion  
12 batteries have severe and constantly degrading defects inherent in their construction. Musk  
13 has known about these dangers for decades but chose to work with Panasonic to cover it up.

14 443.Elon Musk lost a LEMON CAR lawsuit proving that his cars are poorly designed  
15 and manufactured.

16 444.Elon Musk's union negotiating tactics are: "delay, deny, defer and claim to be  
17 conducting a fake study..."

18 445.Elon Musk's take-over of Tesla from Martin Eberhardt, the actual founder, was  
19 based on an Obama Administration scheme to exploit Lithium mines in Afghanistan and  
20 Cobalt mines in the Congo, which Obama financiers had bought the rights to. Frank Guistra  
21 and Goldman Sachs helped come up with this scheme.

22 446.A famous article about SpaceX quotes a top Musk staff staffer saying Musk is a  
23 "liar".

24 447.A top SpaceX engineer has sued Spacex for lying about rocket safety and says that  
25 Musk does not care about science, he cares about publicity.

26 448.Most of the "famous" people Musk hired, quit after seeing what a sham his  
27 operations are.

28 449.Jared Birchell, of Burlingame, is terrified that Musk will have him killed because he

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1 knows "where the bodies are buried", but he has to act demure and "stay-off-the-press-radar"  
2 for now to keep Musk from paying too much attention to him.

3 450. Every property that Musk owned has been bugged by government, news or  
4 competitor specialists.

5 451. Musk takes a number of drugs for mental issues yet he runs companies with  
6 products that can easily kill their users. Many think that he should be under closer federal  
7 supervision.

8 452. The U.S. Department of Energy PR Department has been ordered by Obama  
9 officials (who, shockingly, are still there even during the Trump Administration) to always  
10 hype up Musk because, WHEN Musk fully fails, it will prove that The U.S. Government  
11 funded him because **Obama ordered them** to and not *based on any* merits. Most every  
12 Applicant for GOVT funds beat Musk on every merit EXCEPT CRONYISM!

13 453. Trump-hating Elon Musk wanted to nay say Trump by subjecting Tesla workers to  
14 COVID death by refusing to close plant

15 454. Musk uses his own workers to play deadly politics with their lives in COVID  
16 closure he refused

17 455. Musk totally lied about his capacity, ability and knowledge to make COVID  
18 ventilators in order to scam political funding

19 456. Musk sent snoring devices instead of ventilators and lied about those products in  
20 order to Virtue Signal for his own hype

21 457. Musk has had babies with many women in an Epstein-like master plan to seed the  
22 world with his DNA so that mini-Musk's will live on forever. Each ex-baby momma has  
23 been paid massive sums to keep quiet about his misdeeds.

24 458. Musk uses his many mansions to hide money and operate tax manipulation efforts.

25 459. The "Mainstream Media" is controlled by Democrat bosses who refuse to allow any  
26 negative news to be printed about Musk because Musk conduits funds to the DNC.

27 460. One of Musk's 'baby ovens' known as "Grimes" has been revealed to have been used  
28 as a "sex toy for Musk" by Grimes friends.



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1 461.The U.S. Department of Energy has a federal policy of promoting Musk's hype  
2 because they are liable for criminal prosecution because Secretary of Energy Steven Chu and  
3 his staff helped organize Musk's embezzlement of taxpayer funded monies and insider-  
4 traded on that profiteering.

5 462.Failing Elon Musk tries to make Alameda County pay for his failed NUMMI  
6 factory by using COVID as an excuse!

7 463.The cooling fluid of Tesla cars leaks into the battery chamber and causes the  
8 batteries to explode and Musk ordered that defect covered up.

9 464.The touch-screen on the car has a huge number of programming defects in it that  
10 can crash the car

11 465.Musk has had unprotected sex with a number of women and is on a mission to get a  
12 number of women pregnant in order to "spread his DNA around".

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## **The Malignant Narcissism And Cartel Climate Of Elon Musk And His Billionaire Frat Boy Club**

At almost every juncture, Elon Musk has made egotistical decisions that lead to more failures. His behavior is that of a person who has no care or concern for the health, safety and welfare of the American people. Nothing could epitomize that more perfectly than his grotesque suggestions that we should shoot nuclear bombs off on Mars or that nobody will care that his Starlink Satellites are designed to spy on the public. This would seem comical, and entirely unbelievable, if it had not actually happened.

In 2006 the many scientists told Elon Musk and his advisers of the high likelihood that a pandemic of lithium ion battery explosions would strike the nation and advised the incoming administration to take appropriate steps to reduce its impact. Obama officials hid the dangers because they owned stock in lithium and cobalt mines for those batteries, particularly in Afghanistan.

In November of 2007, the experts warned Obama that the country was likely to be afflicted with a devastating pandemic of lithium ion originating from Asian and Russian oligarchs.

In January 2009, the Obama administration was told by its own experts, Bernard Tse and his team who knew Tesla bosses, Sandia and others that the lithium ion batteries in Tesla cars had degrading chemistry which become a global pandemic of auto danger. Again, Obama chose inaction.

Obama and Musk have deprived Democratic-led regions of the country from receiving needed safety reviews of Tesla cars.

Over the year's since 2006, Americans working with the GOVT, NHTSA, SEC and other groups accelerated warnings to Obama officials. These engineers and other science professionals were intentionally ignored in order to protect politicians stock market profits.

In these, [and any other examples](http://www.testimony111.com/), ( <http://www.testimony111.com/> ) Musk and his inner circle of White House and Senate insiders ignored or purged experts and other truth-tellers, and lied about, misrepresented, deflected or denied the dire threat to the American people posed by the lithium ion battery scam.

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1 Considered in total, Musk and his regime have shown themselves to be incompetent,  
2 callous, malevolent and deeply cruel in their response to the Tesla safety issue crisis (as well as to a  
3 plethora of other issues).

4 But to merely document the Musk regime's deadly failures in response to the dangers of his  
5 companies is to ignore the most important question: What are Musk's and his advisers' underlying  
6 motivations?

7 This forensic question must be answered if we are ever to have a full accounting of the  
8 Musk Corruption, and see justice done for the voters, the dead tesla victims and those who will die  
9 in the future as well as the damage done to the broader American community.

10 The coordinated 'main-stream' media's preferred storyline that suggests Musk is simply  
11 incompetent doesn't add up because Muskhhas made the wrong decision every single time in terms  
12 of how crises like this are supposed to be dealt with. (i.e. Be consistent, transparent, factual, and  
13 credible.) It's increasingly not believable for the left-wing press to suggest that Musk has been  
14 distracted or inept during this crisis, in part because of the level of his uselessness has become so  
15 staggering.

16 Maybe Musk is vengeful. Maybe he wants to wreck the economy to create investment  
17 opportunities? He's under the thumb of a foreign entity? He wants to cause panic and cancel the  
18 November elections? He's a fatalist? Who knows. And honestly, the specific "why" isn't what  
19 matters now. What matters is asking the difficult questions and pondering what the Musk oligarchy  
20 is truly about, no matter what lurks in the shadows...

21 Now the press needs to shift some of its focus and ask the truly alarming questions about  
22 Musk and his motives. Because we still don't know why he essentially ordered his companies to  
23 embark on such sinister ventures involving slicing up brains; over-priced deadly cars for rich  
24 douche-bags; digging holes for billionaire hide-outs, launching domestic spy satellites and  
25 manipulating elections along with his boyfriend: Larry Page, etc...

26 Psychologist and psychotherapists have an answer: Elon Musk is a "**malignant narcissist**".  
27 Musk's mental pathologies inexorably compel him to hurt and defraud large numbers of people —  
28 including his own supporters.

1 exports have looked at Musk's borderline personality disorders. They explain that sadism  
2 and violence are central to Musk's malignant narcissism and his decision-making about his self-  
3 promotion. They warn that Musk is abuser locked into a deeply dysfunctional relationship with the  
4 American people and that, like other sadists, Musk enjoys causing harm and suffering to any that do  
5 not recognize his "tech Jesus" self-proclaimed superiority.

6 Ultimately, all psychologists generally concludes that Musk is engaging in "democidal  
7 behavior" (  
8 <https://www.taylorfrancis.com/books/9780203793756/chapters/10.4324/9780203793756-2> ) in  
9 partnership with Obama and Pelosi and cautions that the many dead and injured (so far) from the  
10 Tesla fires and crashes are not simply collateral damage from the Musk madness, but rather the  
11 logical outcome of Musk's apparent mental pathologies and the poor decisions that flow from them.

12 Musk is both denying responsibility by saying things such as, "I take no responsibility.  
13 We've done everything right." But at the same time, Musk is also sabotaging the efforts to stop the  
14 corruption in his empire. This is a very important aspect of Musk's behavior. Musk is not just  
15 deflecting blame onto others, he is actively interfering with the politicians' ability to do their job  
16 by controlled Senators with bribes. Musk is not just incompetent. He is actively engaging in  
17 sabotage against competitors and reporters who speak the truth about him.

18 You might wonder: How does someone with his type of mind reconcile claims like "I have  
19 total power" with "I take no responsibility"? He has said both things within a few days of each  
20 other. Well; That is a function of how the psychology of a malignant narcissist is structured. When  
21 Musk says things such as, "I have total power," that's the grandiosity. "I'm in total control" is a  
22 function of Musk's paranoia, where everything bad is projected outward. Therefore, anything  
23 negative or bad is someone else's fault. Bad things are 'other people' in Musk's mind. The  
24 grandiosity and "greatness" are all him. Musk's mind runs on a formula which bends and twists  
25 facts, ideas and memories to suit his malignant narcissism. This is why Musk contradicts himself so  
26 easily. He lies and makes things up. His fantasies all serve his malignant narcissism and the world  
27 he has created in his own mind about his greatness.

28 Another component of Musk's malignant narcissism is sadism. That part of Musk's mind is

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1 more hidden. People such as Musk are malignant-narcissist sadists because they, at some deep level,  
2 are driven to cause harm to other people. Musk's life is proof of this. His pedo father and trophy  
3 wife narcissist mother demonstrate his roots. He enjoys ripping people off and humiliating people.  
4 He does this manically and gleefully. He has lied thousands of times. He threatens people online  
5 and elsewhere. Most psychologists believe that Elon Musk is also a sexual sadist, who on some  
6 basic level enjoys and is aroused by watching people be afraid of him. In his mind, Musk is creating  
7 chaos and instability so that he can feel powerful.

8 Professor of psychiatry and psychoanalyst Otto Kernberg called that phenomenon  
9 "omnipotent destructiveness." The bullying, the violence, the destruction, frightening people,  
10 humiliating people, getting revenge and the like — such behavior is what Elon Musk has done his  
11 whole life. It is who Elon Musk really is. Unfortunately, too many people are still in denial of that  
12 fact.

13 Musk has to create and control a field of negative corrupting energy around himself. For  
14 example, he pressures the scientific experts to bend the truth to his dreamworld during his press  
15 conferences. The scientists are basically Musk's hostages. The American people are hostages as  
16 well to Elon Musk's lies. Plaintiffs are being abused by him. Plaintiffs know that Musk is lying.  
17 Plaintiffs know that he's doing nothing to help us. Plaintiffs feel helpless to do anything to stop him.  
18 It is causing collective mental despair. It is not that all Americans are suckers or dupes, it is that  
19 Musk is a master at such cruel and manipulative behavior.

20 Elon Musk is a master at getting negative attention, and the more people he can shock and  
21 upset, the better.

22 Malignant narcissists like Elon Musk view other human beings as kindling wood to be  
23 burned for their own personal enrichment, media enlargement and hype expansion.

24 Follow the facts to the obvious and true conclusion. If all the facts show that Elon Musk  
25 (and his little boy buddies Larry Page, Eric Schmidt, John Doerr, Reid Hoffman, Steve Westly, etc.)  
26 is a malignant narcissist with these powerful sadistic tendencies, this omnipotent destructiveness,  
27 where he's getting pleasure and a sense of power from dominating people and degrading people and  
28 destroying people and plundering people and laying waste to people, both psychologically and

1 physically, then to deny such obvious facts is willful ignorance.

2 **When Musk is finally exposed, like Elizabeth Holmes and Theranos or ENRON, it will**  
3 **be glorious.**

4 Rather than making a prediction as to Musk's specific actions when the emperor has no  
5 clothes, it is more helpful to describe the type of actions he will take. Rather than trying to say,  
6 "This is the move he'll make." Like in a relationship, Elon Musk is the abuser. He is the husband or  
7 father who is abusing his partner or children or other relatives. The American people are like a  
8 woman who is leaving her abuser. She tells her abuser, "That's it! I am done with you!" She has her  
9 keys in hand and is opening the door of the house or apartment to finally leave. What happens? The  
10 democidal maniac Elon Musk will attack us, badly. Make no mistake. Elon Musk is going to find a  
11 way to attack and cause great harm to the American people if he believes that he will be fully  
12 exposed. He will use his spy satellites, his media controls, his remote controlled cars, his stock  
13 market manipulation tools, his Goldman Sachs economic destruction team and more. Musk will  
14 strike back... unless the FBI finally arrests him first.



*Figure 8: Elon Musk And Elizabeth Holmes =  
2 of a kind*

**Elon Musk Has Stolen Every Bit Of Technology He Has exploited**

In a shocking expose by [Paul Lienert](#), [Norihiko Shirouzu](#), and [Edward Taylor](#), they reveal that while Elon Musk is hailed (by his own PR and hype) as an innovator and disruptor who went from knowing next to nothing about building cars to running a car company, he swiped all of his technology from others.

His Tesla car, his hyperloop train, his tunnel digger, his 'brain chip' ...everything he has done was created by somebody else. The original founders of Tesla sued him for coming in and taking over the company.

Musk's record shows he is more of a fast learner who spies on other firms that had technology Musk lacked. Musk stole their most talented people, and then blew his competitors off the grid with anti-trust violating monopoly tactics.

Musk has been dropping hints for months that significant advances in technology will be announced as Tesla strives to get away from corrupt Panasonic and their awful toxic, exploding batteries.

New battery cell designs, chemistry and manufacturing processes are just some of the developments that would allow Tesla to reduce its reliance on its long-time battery partner, Japan's Panasonic (which has been accused of bribery, product dumping and other illicit deeds), people familiar with the situation said.

"Elon doesn't want any part of his business to be dependent on someone else," said one former senior executive at Tesla who declined to be named. "And for better or worse - sometimes better, sometimes worse - he thinks he can do it better, faster and cheaper." The problem is, Musk does his version of "better" by ripping everyone off and hiring moles and character assassins to go after any competitors that get in his way. Musk has been documented hiring Nicholas Guido Denton's tabloid empire (Gawker/Gizmodo/Jalopnik...) character assassination service to operate massive hit-jobs against his adversaries.

Tesla has battery production partnerships with Panasonic, South Korea's LG Chem and China's Contemporary Amperex Technology Co Ltd (CATL) that are expected to continue.

But at the same time, Tesla is moving to control production of cells - the basic component of

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1 electric vehicle battery packs — at highly automated factories, including one being built near  
2 Berlin, Germany and another in Fremont, California where Tesla is hiring dozens of experts in  
3 battery cell engineering and manufacturing.

4 “There has been no change in Plaintiffs relationship with Tesla,” Panasonic said in a  
5 statement provided by a company spokeswoman. Of course, Panasonic has to say that.

6 “Plaintiffs relationship, both past and present has been sound. Panasonic is not a supplier to  
7 Tesla; we are partners. There’s no doubt Plaintiffs partnership will continue to innovate and  
8 contribute to the betterment of society.”

9 Tesla did not respond immediately to a request for comment.

10 Since he took over the fledgling Tesla company in 2004 in a hostile tactile take-over,  
11 Musk’s goal has been to learn enough - from partnerships, acquisitions and talent recruitment - to  
12 bring key technologies under Tesla’s control, people familiar with Tesla’s strategy said.

13 They said the aim was to build a heavily vertically integrated company, or a digital version  
14 of Ford Motor Co’s iron-ore-to-Model-A production system of the late 1920s.

15 “Elon thought he could improve on everything the suppliers did - everything,” said former  
16 Tesla supply chain executive Tom Wessner, who is now head of industry consultancy Imprint  
17 Advisors. “He wanted to make everything.”

18 Batteries, a big chunk of the cost of an electric car, are central to the Musk method. While  
19 subordinates like Bernard Tse have argued, for years, against developing proprietary Tesla battery  
20 cells, Musk continues to drive toward that delusional control-freak goal.

21 “Tell him ‘No’, and then he really wants to do it,” said a third former Tesla veteran.

22 Reuters reported in May that Tesla is planning to unveil low-cost batteries designed to last  
23 for a million miles. Tesla is also working to secure direct supplies of key battery materials, such as  
24 nickel, while developing cell chemistry that would no longer need to be as expensive and blood-  
25 mineral sourced as Musk's cobalt.

26 ‘STRAIGHT FOR MARS’

27 Panasonic is partnered with Tesla at the \$5 billion Nevada “Gigafactory”, while CATL and  
28 LG Chem supply cells to Tesla’s Shanghai factory, where battery modules and packs are assembled



1 for its Model 3 sedan.

2 Panasonic recently said it is planning to expand its production lines in Nevada, which supply  
3 the cells that then go into the battery modules assembled next door by Tesla.

4 But the Nevada Gigafactory partnership almost didn't happen, according to two former  
5 Tesla executives. Musk ordered a team to study battery manufacturing in 2011, according to one  
6 former executive, but eventually partnered with Panasonic in 2013 because Musk failed to  
7 understand it.

8 Now, Tesla is testing a battery cell pilot manufacturing line in Fremont and is building its  
9 own vast automated cell manufacturing facility in Gruenheide in Germany.

10 The roller-coaster relationship with Panasonic mirrors other Tesla alliances.

11 During its development alliance with Germany's Daimler, which was an early investor in  
12 Tesla, Musk became interested in sensors that would help keep cars within traffic lanes.

13 Until then the Tesla Model S, which Mercedes-Benz engineers helped refine, lacked  
14 cameras or sophisticated driver assistance sensors and software such as those used in the Mercedes  
15 S-Class.

16 "He learned about that and took it a step further. We asked Plaintiffs engineers to shoot for  
17 the moon. He went straight for Mars," said a senior Daimler engineer said. Musk primarily uses the  
18 "Mars Project" as hype and BS to cover the fact that all of his Starlink, and other SpaceX launches,  
19 are almost exclusively spy satellites to monitor citizens and their internet interests.

20 Meanwhile, an association with Japan's Toyota, another early investor, taught him about  
21 quality management.

22 Eventually, stolen executives from Daimler and Toyota joined Tesla in key roles, along with  
23 talent from Alphabet Inc's Google, Apple, Amazon, Microsoft, as well as rival carmakers Ford,  
24 BMW and Audi.

## 25 **THE MUSK SPIN**

26 Some relationships did not end well, however.

27 Tesla hooked up with Israeli sensor maker Mobileye in 2014, in part to learn how to design  
28 a self-driving system that evolved into Tesla's Autopilot.

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1 “Mobileye was the driving force behind the original Autopilot,” said a former Mobileye  
2 executive, who declined to be named.

3 Mobileye, which is now owned by Intel, also recognized the risk of sharing technology with  
4 a fast-moving startup like Tesla, which was on the brink of collapse at the end of 2008 and now has  
5 a market value of \$420 billion.

6 But Tesla and Mobileye had an acrimonious and public split after a driver was killed in 2016  
7 when a Model S using the Autopilot system crashed.

8 At the time, Amnon Shashua, who is now Mobileye president and chief executive, said  
9 Tesla’s Autopilot was not designed to cover all possible crash situations as it was a driver assistance  
10 system, not a driverless system.

11 The former Mobileye executive said there was no question of Tesla improperly using their  
12 technology.

13 U.S. tech firm Nvidia followed Mobileye as a supplier for Autopilot, but it too was  
14 ultimately sidelined.

15 “Nvidia and Tesla share a common strategy of developing software-defined vehicles  
16 powered by high-performance AI computers. Elon is very focused on vertical integration and  
17 wanted to make his own chips,” said Nvidia’s senior director of automotive, Danny Shapiro.

18 In addition to partnerships, Musk went on an acquisition spree four years ago, buying a  
19 handful of little-known companies - Grohmann, Perbix, Riviera, Compass, Hibar Systems - to  
20 rapidly advance Tesla’s expertise in automation. Maxwell and SilLion further boosted Tesla’s  
21 ability in battery technology.

22 “He learned a lot from those people,” said Mark Ellis, a senior consultant at Munro &  
23 Associates, which has studied Tesla extensively. “He leveraged a lot of information from them, then  
24 put his spin on making it better.”

25 Reporting by Paul Lienert in Detroit, Edward Taylor in Frankfurt and Norihiko Shirouzu in  
26 Beijing; Additional reporting by Tina Bellon in New York and Yilei Sun in Beijing; Editing by  
27 David Clarke

28 [Elon Musk Lies - The Tesla Motors Safety and Corruption ...](#)

 <https://tesla-motors-review.weebly.com/elon-musk-lies.html>

How **Elon Musk's** Investors Manipulate Their Stock Market Valuations via "Pumps": Crimes?- Every Time Bad News Comes Out About Tesla, per an 8 year analysis study, Tesla stock suddenly, and mysteriously, jumps up. Investigators find that it just Tesla investors faking the stock ratings by running "Flashboy" automated stock buybacks.

**[Tesla: Lies And Fraud Engulfed In Elon Musk's Hubris ...](#)**

 <https://investmentresearchdynamics.com/tesla-lies-and-fraud-engulfed-in-elon-musks-hubris/>

Tesla: **Lies And Fraud Engulfed In Elon Musk's** Hubris June 13, 2019 Financial Markets , Market Manipulation , U.S. Economy **Elon Musk** , financial collapse , funding secured , Tesla , TSLA admin **Elon Musk** should have considered a career as a children's fairytale author.

**[Elon Musk's Dumb Lie About Smart Cars | Inc.com](#)**

 <https://www.inc.com/geoffrey-james/elon-musks-dumb-lie-about-smart-cars.html>


Two weeks ago, **Elon Musk** predicted that "safe, full self-driving" cars would be available by the end of this year. The impression he left was that Tesla (or, less likely, some other vendor) would ...

**[Did Greedy Elon Musk Peddle Another Lie to Pocket a Hefty ...](#)**

 <https://www.ccn.com/greedy-elon-musk-peddle-another-lie-to-pocket-hefty-payday/>

Just as it seemed a healthy pullback was coming, **Elon Musk** has found another way to pump the stock. Wednesday's trading session saw Tesla undergo some profit-taking, with the stock falling 1.3%. It seemed like perfect timing for **Musk** to make another claim about Tesla's autonomous technology. Why? Because another rally could land him a hefty ...

**[A great list of Elon Musk's lie... uh.. promises with live ...](#)**

 [https://www.reddit.com/r/RealTesla/comments/bxunf6/a\\_great\\_list\\_of\\_elon\\_musks\\_lie\\_uh\\_promises\\_with/](https://www.reddit.com/r/RealTesla/comments/bxunf6/a_great_list_of_elon_musks_lie_uh_promises_with/)

One really needs to look at the whole list to appreciate how full of shit **Elon Musk** is. The amount of effort needed to keep track of all of his BS is non trivial, no wonder so many people are fooled. level 1. 1 ... again **Musk** is incredibly good at controlling his narrative and like all cult

1 followings he needs a scapegoat for his **lies** and ...


2 [\*\*A great list of Elon Musk's lie... uh.. promises with live ...\*\*](#)

3  <https://www.reddit.com/r/RealTesla/comments/bxunf6/>

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8 followings he needs a scapegoat for his **lies** and ...

9 [\*\*Elon Musk lied about the EPA's Tesla Model S test, agency ...\*\*](#)

10  [miles-mistake-door](https://www.theverge.com/2020/5/1/21244556/elon-musk-lie-epa-tesla-model-s-range-<br/>11 miles-mistake-door)

12 The Environmental Protection Agency refuted **Elon Musk's** claim that it made a mistake in  
13 its test of the Tesla Model S Long Range. **Musk** claimed that someone left the door open on the  
14 vehicle, but ...

15 [\*\*Tesla Shareholders: Are You Drunk On Elon Musk's Kool-Aid?\*\*](#)

16  [drunk-on-elon-musks-kool-aid/](https://www.forbes.com/sites/michaelle Witt/2017/10/13/tesla-shareholders-are-you-<br/>17 drunk-on-elon-musks-kool-aid/)

18 Companies tell all types of **lies** to burnish their financial results but **Elon Musk's** fish tales  
19 make Moby Dick look like a guppy Share to Facebook Share to Twitter

20 [\*\*Did Greedy Elon Musk Peddle Another Lie to Pocket a Hefty ...\*\*](#)

21  <https://www.ccn.com/greedy-elon-musk-peddle-another-lie-to-pocket-hefty-payday/>

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26 [\*\*Tesla: Lies And Fraud Engulfed In Elon Musk's Hubris ...\*\*](#)

27  [hubris/](https://investmentresearchdynamics.com/tesla-lies-and-fraud-engulfed-in-elon-musks-<br/>28 hubris/)

1 Tesla: **Lies** And Fraud Engulfed In **Elon Musk's** Hubris June 13, 2019 Financial Markets ,  
2 Market Manipulation , U.S. Economy **Elon Musk** , financial collapse , funding secured , Tesla ,  
3 TSLA admin **Elon Musk** should have considered a career as a children's fairytale author.

4  
5  
6 **Recap:**

7 *The Musk empire has paid more bribes to politicians than almost any other modern entity.*  
8 *That is why no full investigation of the Musk scams has ever been completed. Google's Eric Schmidt*  
9 *and Larry Page have a bromance relationship with Musk and use the global resources of Alphabet*  
10 *to hide any negative news about Musk assets.*

11 *The 2008 Department of Energy Cleantech Crash proves that a federal agency was used as*  
12 *just one big slush-fund to pay-off political campaign financiers, operate insider-trading stocks and*  
13 *sabotage those financiers competitors using taxpayer-financed resources! We have used private*  
14 *investigator, FBI resources and deep AI research to reveal that all government staff working on*  
15 *Plaintiffs application were getting quid-pro-quo...they were on the take. (Can anyone point out to us*  
16 *EVEN ONE person who was in the GOVT/White House loop who was not working for, invested in,*  
17 *getting a future job from or other wise conflicted?) What do you do when The U.S. Government*  
18 *convinces you to invest millions of dollars, and your life, into one of their projects.*

19 *When their project turns out to be a scam where they had covertly hard-wired the upside to*  
20 *a couple of Senator's and their campaign financier friends. The fix was in and the game was rigged*  
21 *to use a government program as a slush-fund for friends-with-benefits. We, and the public, got*  
22 *defrauded. Now the damages must be paid for, one way, or another. Every one of the insiders who*  
23 *did get government funding got it in the exact same size and order as their covert political*  
24 *campaign funding and stock market bribes to the deciders.*

25 *Chamath Palihapitiya and other Silicon Valley insiders have now exposed the fact that*  
26 *Greylock, Kleiner, etc. are just a VC Ponzi Scheme! in this whole mess. Musk used crooked*  
27 *Senators to get his funds. Those Senators and government agency bosses were financed by, friends*  
28 *with, sleeping with, dating the staff of, holding stock market assets in, promised a revolving door*

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1 job or government service contracts from, partying with, personal friends with, photographed at  
2 private events with, making profits by consulting for, exchanging emails with, business associates of  
3 or directed by; one of those business adversaries, or the Senators and politicians that those  
4 business adversaries pay campaign finances to, or supply political search engine manipulation  
5 services to.

6 *Elon Musk is notorious for getting Department of Energy money by bribing public officials*  
7 *and placing his friends: Steven Chu, Matt Rogers, Steve Westly, Steve Spinner's 'special friend', etc.*  
8 *on the staff of The U.S. Government and in the White House. We have FBI-class records, financial*  
9 *tracking, emails, stock market relay records and other forensic data that proves it. We can swear,*  
10 *warrant, certify and prove these assertions in front of Congress in a live Congressional hearing or*  
11 *Civil Jury trial, given non-compromised legal backing.*

12 *If you think you have bribed the same number of Senators, bought a President and taken*  
13 *over most of The U.S. Government like Musk did... go for it! In this day and age, with every citizen*  
14 *able to track every public figure, with FBI-quality databases, on their home computers, it might be*  
15 *a crash-and-burn but you are welcome to try. Lithium metals, and other rare earth mining*  
16 *materials, are monopolized by Elon Musk and his Silicon Valley Cartel, in rare-earth corrupt*  
17 *mining scams.*

18 *Lithium's widespread use in cars is hindered by a challenging obstacle: upon multiple*  
19 *charge-discharge cycles, fractal filaments called dendrites always grow through the electrolyte*  
20 *from the negative to the positive electrode and short-circuit the battery from the inside, thus*  
21 *guaranteeing that Tesla Cars will eventually all explode. Musk and Panasonic have known this*  
22 *since 2007 (They are "dumping" the batteries via Tesla) and have paid U.S. Senators, who own*  
23 *stock in Tesla, to cover it up. The lithium fires and toxic vapors are a major safety concern because*  
24 *they have killed, poisoned and injured too many citizens.*

25 *Musk gets away with his scams because he pays U.S. Senators bribes with stocks in his*  
26 *corporations and has a thousand crooked Goldman Sachs investment bankers selling his hair-*  
27 *brained schemes to your parents pension funds. Tesla is known as "the official car of douche-bags".*  
28 *The safety defect cover-ups on the Tesla are extreme.*

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1 Musk's narcissistic trophy-wife mom and his extremist father (who got his young sister  
2 pregnant) are thought to be the cause of Musk's racism and sociopath behaviors. He is the #1 crony  
3 capitalist government mooch in America and has received billions of dollars of your tax money to  
4 help him buy his mansions, starlets and sex parties.

5 His cars and rockets blow up, his tunnels are unsafe, his satellites spy on consumers and his  
6 brain chip company tortures small animals. He swiped all of his technology from someone else and  
7 has never come up with his own inventions. There are thousands of pages of evidence, such as the  
8 following examples, that prove that Musk is a corrupt covert government official sponsored by  
9 corrupt members of the government in exchange for money-laundering and political services. There  
10 is no other possible explanation for how an awful person like Musk could exist based on  
11 government payola:

## (REVIEW) Analyzing the Nasdaq TSLA Stock Market Bet Via A Diverse Set Of Analysts Reports



There is a list of over 1000 illicit, criminal, abusive, monopolistic, corrupt and sociopath-like things that Elon Musk has done that the FBI, FTC, SEC and others have. Why has Musk not been arrested? Because he is 'protected' by his co-investors: Dianne Feinstein, Nancy Pelosi, Harry Reid, Google's owners, Facebook's owners and all of the Silicon Valley Venture Capitalists... but still: He needs to be arrested!



### What Really Went On Between Amber Heard And Elon Musk?

Reveal that it that Elon Musk provided to his parents (Amber Heard), even after Drage and Heard married in 2015.

By Adam Lipton



### Elon Musk faces court trial after shareholder sued him and Tesla claiming the CEO's 2018 pay packet worth £2.5billion was excessive and a breach of the board's duty



Tesla shareholder Richard Tometta brought a lawsuit against Elon Musk and members of Tesla's board in 2019 after the CEO's pay package, worth around \$2.5 billion, was cleared.

### 'Kill them dead. Die. Die. Die!' Elon Musk's message about rival to his start-up X.com where staff worked 36-hour shifts, slept under their desks and competition was so brutal 'it would make the creator of Game of Thrones blush,' new book reveals



Details about Elon Musk are revealed in 'The Founders: The Story of PayPal and the Entrepreneurs Who Shaped Silicon Valley', by author Jimmy Soni.



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[Corruption And Crappy Engineering - More Than Musk's So Unsafe ANYONE FAILED TESLA BAD C - MUSK](#)

[1](#) [2](#) [3](#) ... [78](#) [Next »](#)

*Almost every single investor of Elon Musk is also the primary financier and beneficiary of the politicians, and their Congressional shenanigans, that used taxpayer money and resources to give Musk's companies all that free money. For example, Dianne Feinstein's family run the HR service (Herb Newman), the construction company, the railroads, the building leases (CBRE), the China funds (Mart Bailey, Steve Westly, Steve Spinner, et al) and swap staff members for Tesla and Solyndra.*



*Feinstein and Pelosi blocked funding for all Tesla competitors for the same State and Federal cash and tax waivers and for the NUMMI factory. The California politicians, personally, made billions off insider trading, pump-and-dumps and payola. Felonies? You Bet! When Musk owns two different seated Presidents, 22+ major Senators and 17 major agency bosses and Governors, why should he worry? If only the FBI, DOJ, SEC, FTC, etc., didn't have other things to do. Tesla, and everything Musk does, are corrupt mobster operations..."*



#### THE CROOKED ELON MUSK FAMILY: MEET THE KING OF COVER-UPS:

Many people think that Elon Musk, his family and his Tech Cartel are the biggest, lying, scumbag mobsters in history! It is time to arrest Elon Musk!

**Tesla Will Pay \$0 Federal Tax Despite  
Elon Musk's \$11 Billion Personal Tax  
Bill**

Tesla had no taxable income to report to the U.S.  
IRS (2019-2020)



#### THE FORBIDDEN TESLA TIMELINE THAT MUSK'S COVER-UP PEOPLE DON'T WANT YOU TO SEE:

Derived from RICO CASE FILE #456-D-hj45A and Tesla Employee Testimony. 15 Tesla employees have provided every company email since 2003, between all suppliers, investors and third parties. (Their hard drives did not crash). All of this information can be independently verified with minor research and interviews.



**(ANTI-CORRUPTION) THE ELON MUSK CORRUPTION INVESTIGATIONS - PART ONE**

**DISCLAIMER:** Scott has been interviewed by government law enforcement and regulatory agencies, on an on-going basis, about Elon Musk's corruption, lies about financing and safety defects, tortuous interference, attacks on competitors using retained corporate espionage 'hit-men' and other misdeeds. Facebook - Google - Instagram - YouTube, Tesla, et al, are all the SAME lawyers, CPAs, lobbyists, i-bank, political operatives, VC's and insiders meeting the DOJ legal definition of a "Cartel" or "Enterprise".



By comparing records and files from FINCEN, FBI, FTC, SEC, Congressional Investigators, ICIJ, FEC, DOJ, ProPublica, and other sources, one can easily see that political officials own Google, Tesla, Facebook, YouTube, Instagram, et al, (AKA "The Tech Cartel" or, in legal terms: "The Enterprise"). This explains why those companies have been exempt from regulation and prosecution. Those public officials and tech company oligarchs have exchanged millions, and millions, of dollars between themselves and their families for profiteering. PANASONIC'S LITHIUM ION BATTERIES WERE NEVER DESIGNED AS AUTOMOBILE POWER STORAGE SOLUTIONS AND WILL ALWAYS BLOW UP.

TESLA DOWNGRADED THE POWER OF ALL TESLA'S TO PREVENT THE CARS FROM BLOWING UP, BUT THAT MEANS TESLA DEFRAUDED ALL BUYERS OF TESLA CARS!



They were all either financed by, friends with, sleeping with, dating the staff of, holding stock market assets in, promised a revolving door job or government service contracts from, partying with, personal friends with, photographed at private events with, exchanging emails with, business associates of or directed by; our business adversaries, or the Senators and politicians that those business adversaries pay campaign finances to, or supply political digital search manipulation services to. Criminal U.S. Senators coordinated and profited in these schemes.



Their own family members have now supplied evidence against them. You don't hear about this, much, in the "main-stream news" because nearly half of Congress, White House staff and government agency bosses own the stock in the news broadcasters and receive billions of dollars of financing from them.



Many witnesses, including us, have now sworn, warranted and certified to federal law enforcement about the details of these



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began to show the Roadster at events to market it.

August. Elon Musk, John Doerr, Rahm Emanuel, Robert Gibbs and David Axelrod discuss a quid-pro-quo scheme to advance money for the Presidential and Senate campaigns and get paid back in spades from TARP and Dept. of Energy "Loans", tax credits, stock perks and monopolies.

September. 120 employees. They made more tests, including radiated emissions and susceptibility testing. EMF emissions during charging were high and those reports were ordered shredded

October. They made a durability test, which consists of driving the Roadster on a cobblestone racetrack. The idea is to simulate 100,000 miles in 6 months. It would have taken much longer time to drive the same distance on a smooth road. Tesla realized that their computer models were inaccurate - the Roadster's transmission didn't survive the durability test. Tesla is warned, by Detroit UAW executives that everything they are doing is wrong, wasting tens of millions of dollars and could damage the overall auto industry. Musk hates unions and pledges to keep unions out. He ignores the advice due to narcissism issues.

November 2004. 144 employees, and more tests, including driving through a saltwater bath.

December. They showed the EP 2 at the Los Angeles Auto Show.



## 2007

January. Tesla brought the Roadster to Arvidsjaur, Sweden, to see if it could survive winter conditions. It had severe charging issues

February. 205 employees. Tesla began to build a validation prototype (VP), where they took everything they learned from the engineering prototype. Tesla says it will build a \$35 million plant in Albuquerque, to produce the Model S. They lied.

March. 230 employees and they finished the VP 1.

April. In dire finances, Tesla raised more money - a series D round led by Elon Musk, Technology Partners, and Vantage Point.

June. Tesla's motor factory in Taiwan was finished and it began producing parts.

July. A new transmission was somewhat finished but still has ongoing problems.

August. Tesla finished the VP 10. CEO Martin Eberhard was replaced by Tesla investor. Tesla's are now \$100,000.00 over budget PER CAR Michael Marks, hired, who would work as an interim-CEO until Tesla found a long-term CEO.

September. Tesla delayed the launch of the Roadster because they needed more time to test its durability.

October. Tesla transmission failed in the durability tests. Massive engineering failures are piling up. Tesla needed yet another transmission.

November. Actual Tesla Martin Eberhard is forced out of the company after confronting Elon Musk regarding Musk's manipulations. Musk orders his PR group to launch character assassination campaign against Eberhardt

December. Interim CEO Michael Marks see the lies and leaves and is replaced by interim CEO Ze'ev Drori. Bernard Tse is contracted, by Tesla, to hide the Tesla battery explosion documents that have been uncovered.

December. Tesla says it will build its factory in Southern California. They lied.

December. Sex worker hired by Musk attempts blackmail. Lawyers shut her down



## 2008

January. 260 employees. The VPs survived the new tests, so the Roadster was finished -except for the transmission. Tesla

Pg 550 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH**HIGHLIGHTS:**

(Full Timeline is 42 pages long)

**1880's**- Detroit Electric sells Electric cars commercially

**1900**. 38 percent of US automobiles are powered by electricity, but as Henry Ford designed the much cheaper T-Ford, the electric cars began to disappear.

**1970s**. The price of gasoline hits record because of a series of energy crises, so the interest in electric cars increased again.

**June 1971**. Elon Musk was born to one of the most dysfunctional families in the world.

**1996-1999**. General Motors produced an electric car called EV1 and leased it to customers.

**1998** - Elon Musk is spending his fathers ill-gotten mining dollars. His father's friends tell Musk to "keep an eye on the mines in Afghanistan..."

**1999**. Elon Musk sold his company Zip2 and made \$22 million. He founded X.com that would become PayPal.



**October 2002**. eBay acquired PayPal and Elon Musk made \$165 million.

**2003**. General Motors cancelled the lease program and removed the last EV1 from the streets. They said they couldn't sell enough of the cars to make the EV1 profitable.

July. Martin Eberhard and Marc Tarpenning incorporated Tesla Motors. They had earlier made a feasibility study to see if they could make an electric car. They now made a feasibility study together with AC Propulsion to see if the batteries would work.

November. The 2 employees searched for a partner to build the rest of the car. Lotus became their choice. Lotus engineers, from England, agree to provide chassis of car.



**TESLA'S KILL THEIR OWNERS BECAUSE THEY ARE SO DEFECTIVE AND UNSAFE IN EVERY WAY!**

**2004**

February. Ian Wright, who had met Martin Eberhard while on a plane, joined the company. They finished business plan 1.0. Ian later leaves Tesla in disgust when he realizes what they are up to

March. Starting a car company is expensive, so they began to look for outside investors. Silicon Valley VC's discuss having Elon



### When Elon Musk's Political Bribery Does Not Work!

Marina Koren writes in the Atlantic, that the thought of a three-letter government agency preventing narcissist Elon Musk (currently the richest person in the world from stock market manipulations he created with Goldman Sachs), from doing anything he wants might seem like a bureaucrat's fantasy.



*Tesla's autopilot involved in emergency-vehicle crashes...*

This is the guy who got approval to launch a Tesla into space simply to spray his arrogance across the solar system, who got a street renamed Rocket Road because he had the local politicians by the balls, who disregarded [coronavirus restrictions](#) when he felt they got in the way of ass-hole cars-for-millionaires business. But Musk's ambitious timeline for launching Starship, his wet dream rocket, out of a remote part of Texas depends right now on a pending decision from the Federal Aviation Administration that could add months or even years of delay. Many have already contacted the FAA to say that "Musk is full of shit...his arrogance endangers all... his satellites spy on the public with Google-like spycraft...etc..."

*US probing Autopilot problems on 765,000 Tesla vehicles*



Musk can't bulldoze past regulations of this particular nature. He does have one power that many executives do not: Whenever he talks, people pay attention because he has spent more money to control digital media than anyone in history.

So called "Sociopath", Musk now finds himself at a bit of an inflection point. This could be the year that he smooths out yet another piece of friction in his deep-space enterprise, or it could be the year that momentum stalls. Last night's presentation seemed like a not-so-subtle attempt to show that the success of Starship hinges on what the FAA decides—a heavy message disguised as a fanciful TED Talk. Many nations, and astronomers worldwide, hate Musk because his satellites crash into other spacecraft, fall out of the sky, block observations of deadly asteroids, spy on citizens... and essentially do little that is not evil! In a notorious 60 Minutes interview, experts at NASA dismissed him as a rich flake.

*Tesla reportedly paid \$1 million to former employee who said supervisors called him a racist slur*



The Starship prototype at the center of the show is not the first one SpaceX has built, and it certainly won't be the last. SpaceX keeps blowing up these prototypes until one stays intact. Science says that there are over 80 ways that passengers on SpaceX ships will die, get mutated, get cancer or have their insides toxified. Musk doesn't care. Fame-slutting rides higher than safety for old Elon.

**EXHIBIT 22 - Felony Charges Against affiliated insiders Larry Page, Eric Schmidt, Sergey Brin And Jared Cohen**

**The Spies In Your Pocket Are Rigging Your Elections**

Defendants and their Cartel operatives engaged in election law violating campaign finance, money laundering, illicit political quid pro quo and anti-trust violating operations, among other crimes.

Google was just a search engine that helped you find pie recipes. How did it turn into a cartel-based monopoly of political corruption, domestic spying, sex cults and election rigging? Elon Musk and Google bosses Larry Page and Eric Schmidt shared apartments, lobbyists, Goldman Sachs teams, sex partners, stock market trickery and competitor black-lists. Let's take a look at how that all that worked...

In fact, let's take a look at what the users of the internet, and the news media, say about the Google – YouTube – Alphabet Cartel that this octopus-like crime operation has spawned:

***"Google is a sick corrupt criminal business run by sex trafficking perverts and sociopaths..." Say GOOGLE'S own inside employees, Divorce Court records of Google executives, 70+ State & Federal investigations and major news outlets.***

Most of the U.S. Senators and government agency heads own stock in, get their political campaigns financed by and party with, the owners and executives of the Silicon Valley big tech companies.

That is why those public officials fail to halt the mass societal abuses of those companies. Above all others, the California politicians are in bed with the same criminals they are supposed to regulate.

While politicians shrug off any attempt to bring the oligarchs into line, they provide lip-service, window-dressing pretend actions that have impressive titles but zero bite.

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1 The authors of this report were in private meetings with the investors and founders of the  
2 Silicon Valley “Big Five”, at the inception of their companies, and hereby testify that those owners  
3 planned, with malicious intent, the use of their business licenses for the purpose of manipulating,  
4 harming and restricting the public interest, and DEMOCRACY, for profiteering purposes.

5 Big tech’s “*green-washing*”, false-savior, “*we-are-your-mother*” fake “*do-gooder*” facade is  
6 a sham to sucker everyone.

7 They hide behind a curtain of false altruism and do the darkest deeds any industry can  
8 undertake behind that contrived screen.

9 One of Google , Youtube and Facebook’s most insidious technologies can even get you to  
10 engage in riots, murders and other crimes, even though you might, otherwise, never do those things.  
11 Here is how that technology works:

12 Since the early 20th century, the name of the Russian scientist Ivan Pavlov has been  
13 associated with the idea of brainwashing. Pavlov’s experiments, in which he trained dogs to salivate  
14 in response to a signal such as a bell, showed that the mind could be conditioned to react  
15 automatically to stimuli. But he looked forward to a time when science could manipulate the brain  
16 directly. In a passage eerily accurate in describing today’s neural imaging, he wrote: “If we could  
17 look through the skull into the brain of a consciously thinking person...then we should see playing  
18 over the cerebral surface a bright spot with fantastic, waving borders, constantly fluctuating in size  
19 and form, and surrounded by a darkness, more or less deep, covering the rest of the hemispheres.”

20 We still don’t have a precise topography of the brain in terms of specific thoughts or  
21 feelings. It’s hard to imagine where one would begin if one wanted to surgically force someone to  
22 reveal a particular secret, or to persuade him or her to vote for a certain candidate. But since  
23 Pavlov’s time, science has moved much closer to enabling direct physical control of the brain. In  
24 this century, neuroscientists’ insights into memory, cognition, pleasure and pain may make coercive  
25 “mind control” a reality.

26 The psychologist James Olds (1922-76), one of the founders of modern neuroscience,  
27 conducted an experiment at McGill University in 1953 in which he implanted electrodes deep in the  
28 brains of rats and started observing their responses to electrical stimulation at various sites. His key



1 observation resulted from an accident: He missed the desired anatomical site slightly on one  
2 particular rat. After recovering from surgery, the animal was placed in a special chamber. Every  
3 time it went to a corner of the chamber, it received a small electrical stimulus to the brain, with each  
4 corner stimulating a different site. The rat kept returning to one specific corner, even skipping  
5 eating to hang out there and get the brain stimulation.

6 Olds inferred that there was something pleasurable about receiving a shock at that site in the  
7 brain. Next he started training the rat to go to different parts of the box or to turn right or left before  
8 it could receive the desired electrical stimulation. Using this technique, Olds could elicit complex  
9 behaviors easily; Pavlov would have been envious about this shortcut to behavioral conditioning.  
10 Olds observed that "Left to itself in the apparatus, the animal...stimulated its own brain regularly,"  
11 up to 5,000 times an hour.

12 The mind-control possibilities for this intervention sounded almost limitless, but would it  
13 work on people? Psychiatrist Robert Heath (1915-99), of Tulane University, performed studies with  
14 human patients, including one code-named B-7, a 28-year-old man with severe narcolepsy. Heath  
15 implanted a series of electrodes in various areas of his brain and asked the patient what he felt after  
16 each area was stimulated. One area was so aversive that the patient intentionally broke the stimulus  
17 button so that he would never have to experience that sensation again.

18 However, the feelings evoked by stimulating a different site were intensely pleasurable. The  
19 patient learned that he could block an incipient narcoleptic attack by self-stimulating; he was able to  
20 control his symptoms so well that for the first time he was able to get a job. On the rare occasion  
21 that he fell asleep too rapidly to press the button, his friends knew that they could promptly wake  
22 him up by pressing it for him.

23 Neurosurgical techniques have continued to evolve to be less invasive, less risky and applied  
24 to very specific areas of the brain.

25 At one point the CIA approached Heath, asking if he would work with the agency to study  
26 the brain's pleasure and pain system. He spurned the invitation, he told a New York Times reporter  
27 in 1977: "If I had wanted to be a spy, I would have been a spy. I wanted to be a doctor and practice  
28 medicine." This kind of work, most of which was conducted in the 1960s and 1970s, has largely

1 been shut down because of ethical concerns.

2       However, the underlying neurosurgical techniques have continued to evolve. Fifty years  
3 after Heath's studies, procedures are less invasive, less risky and can be applied to very specific  
4 areas of the brain. Implanted deep-brain stimulators (DBS) are used by thousands of people with  
5 Parkinson's disease to help control their muscle movements, as well as for other conditions such as  
6 pain and epilepsy. There is ongoing interest in using such interventions on different sites in the  
7 brain to treat patients with psychiatric disorders, particularly patients with treatment-resistant  
8 depression.

9       Deep-brain stimulation requires painstaking surgery and expensive equipment, suitable for  
10 an individual but hardly appropriate for group interventions. Is there a way of stimulating a group of  
11 people without implants? In her 1996 book "Cults in Our Midst," Psychologist Margaret Singer  
12 described love bombing," an indoctrination technique used by some cults in which recruits are  
13 given so much flattery and adulation that they feel welcome and safe.

14       The neuroendocrine equivalent involves a hormone called oxytocin that is manufactured  
15 deep in the brain. People release oxytocin when they are bonding with another; it is sometimes  
16 nicknamed the feel-good hormone. Early research found that it is increased during breast-feeding  
17 and during sexual intimacy. Subsequent research showed that oxytocin is also produced in other  
18 situations of closeness—prayer, team sports, even when dog owners interact with their pets.

19       But there is a darker side to oxytocin. Experiments have found that it can stoke trust and  
20 cooperation within a group at the expense of distrust of people outside the group. Currently, the  
21 most effective way of administering oxytocin is through a nasal spray, but if it were possible to  
22 administer it orally or via aerosol, it could conceivably be used in group settings to increase  
23 attachment and thereby recruit new potential members of a cult or party. People might willingly join  
24 a group or adopt a new belief if it allowed them to receive pleasurable stimulation—after all, addicts  
25 aren't particularly squeamish about what they need to do to obtain their drugs.

26       On the other side of the coin, people might repudiate their old beliefs or identities to turn off  
27 painful stimulation, the way patient B-7 broke his stimulus button. When the dystopian movie "A  
28 Clockwork Orange" was released in 1971, audiences were stunned by its portrayal of the power of

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1 aversive conditioning. The advance of neuroscience means that such techniques are no longer just  
2 fantasies. So far they have been kept in check only by government regulation and medical  
3 professionals' sense of ethics. But governments are always seeking new weaponry, and history  
4 suggests that there will always be some researchers who close their eyes to the implications of their  
5 work or justify it as a way to protect society from looming threats. Their self-restraint may not  
6 always protect us from the dark potential of Google and Facebook's scientific coercion. This report  
7 goes deeper into those contrived and manually steered tech manipulations operated by Big Tech's  
8 executives.

9 Google is manipulating your internet searches, your elections, your perceptions of the news,  
10 your democracy, your ideologies and your school curriculum's. Google and their cartel (including  
11 FACEBOOK, NETFLIX, LINKEDIN, YOUTUBE, et al ) collude to manipulate social dynamics.  
12 White House executives, Federal Agency Executives and U.S. Senators including Dianne Feinstein,  
13 Kamala Harris, John Podesta, Nancy Pelosi, Harry Reid own, control and finance "***The Deep State***"  
14 because they own, and their families, own the stock in the companies comprising ***The Deep State***,  
15 they tell those companies what to do, they fund those companies and they social communicate with  
16 each other through covert channels, they engage sexually with each other and they exchange stock  
17 market tips and strategies, and that forensic accounting shows that the politicians and the corrupt  
18 companies are all the same organization. ***This, in part, proves that the "Deep State" is "State  
19 Sponsored".***  
20

21  
22 Google, and The Deep State's, socialistic, anti-Christian bias is invisibly reflected in the  
23 suppression of ideological content from appearing in some search results.  
24

25 In shocking research that has spanned the past 6 ½ years, Dr. Robert Epstein – former  
26 editor-in-chief of *Psychology Today* and now Senior Research Psychologist at the American  
27 Institute for Behavioral Research and Technology – has found that by controlling search results,  
28 Google possesses unprecedented power to sway the thinking of undecided voters during an election

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1 campaign.

2 How is it done?

3 Google can manipulate its search engine algorithm to display one-sided search results that  
4 decidedly favor one political candidate over another.

5 Dr. Epstein gave a grim prediction in recent congressional testimony...

6 He said that “democracy as originally conceived cannot survive Big Tech as currently  
7 empowered.”

8  
9 Dr. Epstein is a registered Democrat. He supported and voted for Hillary Clinton in the 2016  
10 election. He has no hidden agenda ... and no axe to grind for President Trump.

11 During the 2016 presidential election campaign, he captured and analyzed “more than  
12 13,000 election-related searches conducted by a diverse group of Americans on Google, Bing, and  
13 Yahoo in the weeks leading up to the election...”

14 During the 2018 midterm election cycle, Dr. Epstein captured 47,000 election-related  
15 searches – plus nearly 400,000 web pages to which the search results were linked.

16 The results of his scientific analysis in both cases were disturbing...

17 The Google search results in 2016 – which account for over 92% of worldwide internet  
18 searches – were significantly biased in favor of Hillary Clinton in all 10 positions on the first page  
19 of search results in both blue states and red states.

20 In 2018, the first-page search results heavily favored web sites and articles favoring  
21 Democrat candidates rather than being evenly split between Democrat and Republican candidates.

22 Very few people who do spontaneous searches ever scroll past the first page of search  
23 results. And Google knows this.

24 Dr. Epstein has conducted dozens of controlled experiments in the U.S. and other countries  
25 to precisely measure – through before-and-after questionnaires – how opinions and votes shift  
26 among undecided voters when search results strongly favor one candidate over another.  
27  
28

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1 He calls this shift “SEME” – Search Engine Manipulation Shift.

2 “SEME is one of the most powerful forms of influence ever discovered in the behavioral  
3 sciences,” Dr. Epstein said in his congressional testimony, “and it is especially dangerous because it  
4 is invisible to people – ‘subliminal’ in effect... Bottom line: biased search results can easily produce  
5 shifts in the opinions and voting preference of undecided voters by 20% or more – up to 80% in  
6 some demographic groups.”

7 I can tell you, this is enough voters to change the results of any election.

8 Dr. Epstein calculated that Search Engine Manipulation Shift likely persuaded at least 2.6  
9 million undecided voters to cast their ballots for Hillary Clinton in 2016 ...and perhaps as many as  
10 10.4 million.

11 In the 2018 midterm elections, Epstein’s evidence suggests that as many as 78.2 million  
12 votes may have been shifted to Democrat candidates due to Search Engine Manipulation Shift.

13 These effects are far more meddlesome and interfering than fake news stories or ads placed  
14 by Russians on social media...

15 While these acts of interference are troubling and unacceptable, they don’t shift very many  
16 votes because they are competitive and visible. Search Engine Manipulation Shift – on the other  
17 hand – is invisible and non-competitive.

18 Dr. Epstein explains: “SEME is an example of an ‘ephemeral experience,’ and that’s a  
19 phrase you’ll find in internal emails that have leaked from Google recently. A growing body of  
20 evidence suggests that Google employees deliberately engineer ephemeral experiences to change  
21 people’s thinking... My recent research demonstrates that Google’s ‘autocomplete’ search  
22 suggestions can turn a 50/50 split among undecided voters into a 90/10 split without people’s  
23 awareness.”

24 As expected, Google, Hillary Clinton, and progressive media outlets have all disputed Dr.  
25 Epstein’s research and his claims...  
26  
27  
28

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1 They all say in unison that this 2016 study of election-related search results has been  
2 “debunked,” and that Epstein’s results aren’t valid because he made “weird methodological  
3 choices” in an earlier 2010 study.

4 But they haven’t debunked his methodology or his results at all...

5 They’re just saying this to try to discredit him and convince people to not take his work  
6 seriously. They haven’t refuted him either by conducting their own comparable studies ... or by  
7 addressing his explanations of his methodology.

8  
9 Incidentally, the number one Hillary Clinton financial supporter in the 2016 election was  
10 Alphabet Inc. – the parent company of Google.

11 You can read Dr. Epstein’s testimony and study the methodology of his experiments [here](#).

12 He is eminently qualified to conduct the type of research he’s been conducting with Google  
13 search – having been a research psychologist for nearly 40 years.

14 He received his Ph.D. at Harvard University in 1981 and has published 15 books and more  
15 than 300 scientific articles on artificial intelligence and other behavioral topics.

16  
17 Dr. Epstein believes the solution to Google’s search engine manipulation is to end its  
18 monopoly over its “black box” algorithm operation.

19 By requiring that the database they use to generate search results must be available in the  
20 public domain – accessible to all – many new search platforms will spring up and compete with  
21 Google, providing the same excellent search results.

22 Incidentally, I find that every time I run a Google search on a topic, I am served biased  
23 viewpoints...

24  
25 Usually a CNN report is first on the list, followed by:

- 26 •The New York Times
- 27 •The Washington Post
- 28 •MSNBC

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•Other pro-socialist media

I often have to scroll to page 7 or 8 to start finding conservative viewpoints.

Since 2012, Google has discriminated against and marginalized our editorial content. If they are doing it to us, they are certainly doing it to conservative web sites with higher numbers of subscribers. See these videos:

<https://youtu.be/rNvgl38TLvI>

and

[https://youtu.be/csye\\_Jkp4eI](https://youtu.be/csye_Jkp4eI)

There were allegations raised that Google was **manipulating the news** to help Hillary. They allegedly steered **2.6 million votes to Hillary** and had far more of an impact upon the 2016 election than Russians. A whistleblower at Google has come out and warned that things are getting worse. Google whistleblower **Zach Vorhies** came out and provided documents and warnings. He said:

*“Before Trump won, Google had this mission statement to organize the world’s information and making it universally accessible and useful.”*

*“After Trump won, they said ‘Well, Donald Trump won because of fake news and Russia hacking the election, so what we need to do is ... protect our users from fake news; we need to protect our users from the damaging effects of Russian trolls and bots.’”*

What is interesting is that Elizabeth Warren has been a longtime critic of the economic power of Amazon, Google, and Facebook. She is making their **break-up** under Anti-Trust Laws a key component of her presidential platform.

Google's ubiquitous search engine, **Google Search**, is the backbone of the tech giant's business.

In many ways, Google Search is the backbone of the modern internet — the way much of

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1 the web is sorted and organized and located. Given how crucial it is to daily internet use for billions  
2 of people around the world, it's a particularly ripe target for manipulation.

3 Google denies doing as much, and [insists that Google Search is built on algorithms](#) and data  
4 gleaned from use.

5 But [a new Wall Street Journal investigation](#) found that Google manipulated search  
6 algorithms in some worrying ways, including prioritizing large businesses over smaller ones,  
7 removing autocomplete results that involve sensitive topics like immigration and abortion, and even  
8 outright blacklisting some websites.  
9

10 In one such change to Google's search algorithms, the service guided search users to more  
11 prominent businesses over lesser-known ones, the Journal reported. That change reportedly helped  
12 to boost Amazon's store in search results.

13 In another example cited in the Journal's report, autocomplete search results for sensitive  
14 subjects were replaced with safer results than those found on competing search engines like Yahoo,  
15 Bing, and [DuckDuckGo](#).  
16

17 Google is known for refusing to share specific details on how its search algorithms operate,  
18 which it attributes to a measure of operations logistics: If the algorithms were public, then they  
19 could be gamed, Google argues.

20 "Extreme transparency has historically proven to empower bad actors in a way that hurts our  
21 users and website owners who play by the rules," Google spokesperson Lara Levin told the Journal.  
22

23 When reached for a response to the report, a Google spokesperson offered the following  
24 statement:

25 "We have been very public and transparent around the topics covered in this article, such as  
26 our Search rater guidelines, our policies for special features in Search like Autocomplete and valid  
27 legal removals, our work to combat misinformation through Project Owl, and the fact that the  
28 changes we make to Search are aimed at benefiting users, not commercial relationships. This article



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1 contains a number of old, incomplete anecdotes, many of which not only predated our current  
2 processes and policies but also give a very inaccurate impression of how we approach building and  
3 improving Search. We take a responsible and principled approach to making changes, including a  
4 rigorous evaluation process before launching any change — something we started implementing  
5 more than a decade ago. Listening to feedback from the public is a critical part of making Search  
6 better, and we continue to welcome the feedback."

7  
8 If you use Google's search engine, "There's no way of knowing what you're missing," says  
9 Gabriel Weinberg, CEO and founder of search engine DuckDuckGo, whose company released  
10 a [study](#) Tuesday claiming that Google is manipulating Americans' search results.

11 The study concludes that Google is editorializing and providing different search results for  
12 different users who search for identical terms, within seconds and minutes of each other.

13 "The editorialized results are informed by the personal information Google has on you, like  
14 your search, browsing and purchase history," the study says.

15  
16 "What we're seeing is intense amounts of variation," Weinberg told Yahoo Finance. "Most  
17 of the people in the study saw results completely unique to them."

18 By unique, Weinberg means that inconsistent source links appeared in search results, and  
19 some of the same links appeared in varying hierarchical order.

20 Seventy-two U.S. participants in the study entered three independent Google search terms  
21 — gun control, immigration, and vaccinations — using a desktop Chrome browser at 9 p.m. eastern  
22 time on July 24, 2018.

23  
24 Unique results were returned for 68% of private searches for "gun control," 57% of searches  
25 for "immigration," and 92% of searches for "vaccinations."

26 According to the study, Google returned these filtered results, regardless of whether  
27 participants searched in private "[incognito](#)," or non-private mode.

28 "It's exactly opposite of what people would expect," Weinberg said.

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1 In non-private mode, unique search results were generated for 59% of searches for “gun  
2 control,” 63% of searches for “immigration,” and 92% of searches for “vaccinations.”

3 “Our proposition is that if you search in the U.S. you should be seeing the same things,  
4 especially when you search major political topics,” Weinberg said.

5 DuckDuckGo decided to run the new study after a previous version examined Google search  
6 results in connection with the 2012 presidential campaigns. A [Wall Street Journal study](#),  
7 commissioned around the same time, mirrored DuckDuckGo’s findings, showing that Google’s  
8 personalized search results inserted tens of millions of more links for then-candidate Barack Obama  
9 than for his primary challenger Mitt Romney.

10 “Search personalization doesn’t actually help search results, it really hurts in the aggregate,  
11 making people more politically polarized,” Weinberg said.

12 In his experience, Weinberg says when consumers think of search personalization they’re  
13 really expecting search localization for services like local weather, local restaurants, and maps,  
14 rather than national or international political issues.

15 “You can do that all without a filter bubble because it’s not based on your search history,”  
16 he said, adding that search-based ad revenue is not dependent on search personalization.

17 DuckDuckGo’s study controlled for local results by designating all local search results as  
18 equal and accounting for no variation if the local links appeared in the same hierarchical order. A  
19 result showing an LA Times link, for example, was treated the same as link to the Chicago Tribune.

20 For critics who dispense with the importance of result order, Weinberg says they’re  
21 mistaken.

22 “The first link gets about 40% of the clicks, the second gets about 20%, and it drops off by  
23 half with each [subsequent] link,” he said. “If you switch the second and first link, that’s actually a  
24 huge difference” because the one is now getting twice as many clicks as the other.

25 Yahoo Finance reached out to Google for a response to DuckDuckGo’s study and didn’t  
26  
27  
28

1 receive a response.

2 “I’m really not on any particular side,” Weinberg said when asked about his political  
3 ideology.

4 He says he’d like to see Congress question Google CEO Sundar Pichai about search result  
5 bias when he testifies before the House Judiciary Committee on December 11.

6 “We understand [the study] is coming from a competitor and there’s an inclination to  
7 believe [the findings] less so. That’s why we made it all public, the data, the code, the directions,  
8 and we are basically saying we believe other people should study this,” he said.

9 Weinberg says editorialized results may be crafted depending on the level of privacy, and  
10 the number of Android products you use.

11 “They may have all your email, they may have all your text messages, have all your photos,  
12 all your contacts, so [editorialized content] can be based on all of those things. It’s a completely  
13 black box and opaque to consumers.”

14 A few people in the study were given a much broader range in search results from what the  
15 majority of participants were seeing, Weinberg said.

16 “You would just have no idea if you were one of those people. And you also would have no  
17 idea, even if you know you’re seeing something different, why you’re seeing it.”

18 The rise of renewed and vociferous social movements for every non-white and non-cis male  
19 group can be seen as paralleling the rise of social media and the domination of technology  
20 platforms. In time, at least in the Western world, when blacks, women, gays, and most other  
21 populations have won equal rights, and even preferential rights, under codified federal law, and  
22 when their social currency has never been higher, it seems now that their voice has never sounded  
23 more pained or aggrieved.

24 Without a doubt, the ease of emoting through a tweet has certainly affected how individual  
25 users can set off maelstroms of irrational fury. Whether calling out real hurt, self-deluded hurt, or  
26

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1 pure schadenfreude, there is no shortage of bored and usually meaningless lives attempting to drag  
2 down a crab that has nearly escaped the barrel of life.

3 The other side of the same coin is how the tech giant themselves can influence the narrative.  
4 We see this play out with not-so-alleged [shadow banning](#) practices of conservative social media  
5 accounts, and most people are by now aware of YouTube [demonetizing](#) conservative channels. We  
6 can add a new wrinkle: The representation of Google Image searches to advance a social narrative.

7  
8 Let's break down what we saw in our own online queries, and then we can analyze it  
9 afterward. Try it out for yourself and leave a comment at the end of the article.

10 *Google Search: "White Men"*

11 The top three rows of the search produced a total of sixteen results. Of those, there were:

12  
13 ○One result featuring a woman of color

14 ○Three results featuring exclusively black men, either as a victim of white brutality or as a  
15 successful black man. Each image is a well-dressed black man wearing a tuxedo or suit.

16 ○Five results featuring either a mug shot of some kind or simply an angry visage.

17 ○Visible taglines for the images including phrases like "Dear White Men, We Need You,"  
18 "White Men Are Bad," "An Angry White Man" and one begins "White Men Aren't Thrilled When  
19 Women"

20 ○Only two results showing white men smiling

21 *Google Search: "Black Men"*

22 The top three rows of the search produced a total of seventeen results. Of those, there were:

23 ○All seventeen results featuring black men

24 ○Eight of the results featuring black men smiling

25 ○At least six of the results explicitly expressing victimhood. A few others are vaguer but  
26 allude to it.

27 ○Visible taglines for the images including: "The Young Black Men Caught," "Why Do  
28 White People Feel," "Photo Campaign That Celebrates Black" and "Resilience Of Black Men."

*Google Search (see feature photo): "White Women"*

The top three rows of the search produced a total of fifteen results. Of those, there were:

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1           ○Five results featuring women of color  
2           ○Two results featuring black men  
3           ○Four featuring white women smiling  
4           ○Visible taglines for the first five results including: “The Trouble with White Women,”  
5 “White Women Need To Talk About Race,” “White Women Aren’t Allies At Work,” “Dear White  
6 Women, No More,” and “White Women: It’s Time To Be...”  
7           ○Other taglines including “White Women Were Southern Slave Owners,” “Being  
8 Exoticised By White Women,” “Black Women Are Paid Less Than White,” and “White Women  
9 Benefit Most (from white privilege).”  
10           *Google Search: “Black Women”*  
11           The top three rows of the search produced a total of sixteen results. Of those, there were:  
12           ○All sixteen results featuring black women  
13           ○All sixteen results featuring well-dressed and well-groomed women  
14           ○Fourteen of the results featuring black women smiling or projecting happiness (the other  
15 two project strength)  
16           ○Visible taglines including: “How Women Have Shaped,” “Studies Suggest Black Women  
17 Are More,” “My Heroes Are Black Women,” and “20 Millenial Black-Owned Brands.”  
18           *Google Search: “White People”*  
19           The top three rows of the search produced a total of fifteen results. Of those, there were:  
20           ○Seven results featuring people of color  
21           ○Four additional results featuring white people protesting in solidarity with black people  
22           ○Just one result featuring a white person smiling (a white woman with dreadlocks)  
23           ○Visible taglines including: “Dear White People,” “Dear White People (again),” “A Letter  
24 To White People,” and another features the deplorable Robin DeAngelo.  
25           *Google Search: “Black People”*  
26           The top three rows of the search produced a total of fifteen results. Of those, there were:  
27           ○All fifteen results featuring black people  
28           ○Eleven results featuring blacks smiling  
            ○Visible taglines including: “What’s Life Really Like For Black,” “Being Black In  
America,” “Racism Grows in Places,” and “Facebook Has Problem With Black People.”  
*An Analysis of Search Results*

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1 An aggregate of the three “white” searches is unflattering for white people. Of the forty-six  
2 total results, a full eighteen (39%) of them depict non-whites, sometimes in roles of victimhood but  
3 usually in portrayals of independence and success. In and of itself, this is not bad, but it is  
4 misrepresentative of the intended search, and as we see, it is not replicated in reverse for other  
5 searches. For the whites themselves, just seven (15%) were represented in a positive light as  
6 indicated by smiling. Put another way, more than twice the amount of blacks were shown than  
7 whites in a positive way – in a search designed to produce white results, to begin with.

8  
9 The taglines are especially egregious. Just two taglines suggest something positive  
10 (“Employment Helps White Men’s Health,” and another is assumed to be positive because it shows  
11 white women rallying against the death of a black woman at the hands of police). Two others are  
12 neutral in that they advertise white shirts. That leaves a full twenty-four taglines (52%) under an  
13 image of white people that states something negative or dangerous about them.

14  
15 An aggregate of the three “black” searches has a different outcome. Of the forty-eight total  
16 results, fully 100% of those results came back with images of black people. In the same vein, none  
17 of the taglines suggest that blacks are dangerous or that anything blacks do is harmful to others (as  
18 is the case especially with white women, more on that anon).

19  
20 Amazingly, twenty-nine taglines portray blacks as victims. Despite the overall happiness of  
21 blacks as seen through imagery, the titling of the pictures nevertheless contends that blacks must be  
22 seen as victims. The taglines refer to the problems being black in America, and several refer to their  
23 killings (always at the hands of whites or police, not other blacks, even though black homicide  
24 victims are killed by other blacks 90% of the time according to the FBI).

25  
26 As it relates specifically to the query of white women, something striking is happening.  
27 There is clearly a concerted effort to portray white women as comfortably and cunningly subversive  
28 (Where is the feminist outrage, by the way?). Most headlines call out white women for a  
combination of their insincere efforts at allying with blacks, benefiting from white privilege, and to

1 really hammer home a negative stereotype, fulfilling the role of a “Karen.” In the intersectional rat  
2 race, the irony is that a significant majority of all women marchers in January 2017 were [white and](#)  
3 [championing leftist causes](#). Two immalleable rules in life: You can’t please everyone, and the left  
4 always consumes its own.

5 It is obvious that the Marxists at Google have an agenda to pursue, namely that the narrative  
6 must be alive and well. White men and women are evil? Check. Are blacks simultaneously victims  
7 of white oppression and strong individuals? Check. The more subtle displays arise when looking at  
8 the positive and negative dispositions. In Nazi propaganda, Goebbels only had to compare [Jews to](#)  
9 [rats](#) for so long before most Germans went along with the lie. How long before a similar lie is  
10 believed here? More concerning, what happens after that?

12 *The Wall Street Journal* has undertaken a thorough [investigation](#) into how Google, despite  
13 its denials and disavowals, manipulates search results to influence what you learn and find online.

14 For years Google executives have insisted that they do not use human intelligence to arrange  
15 the results of online searches. Yet, the *Journal* found that, “Google’s algorithms are subject to  
16 regular tinkering from executives and engineers who are trying to deliver relevant search results,  
17 while also pleasing a wide variety of powerful interests and driving its parent company’s more than  
18 \$30 billion in annual profit.”

20 The *Journal* also found that, “Despite publicly denying doing so, Google keeps blacklists to  
21 remove certain sites or prevent others from surfacing in certain types of results.”

22 The tech giant also influences search results through its auto-complete feature prior to  
23 searching the internet. “In auto-complete, the feature that predicts search terms as the user types a  
24 query, Google’s engineers have created algorithms and blacklists to weed out more incendiary  
25 suggestions for controversial subjects, such as abortion or immigration, in effect filtering out  
26 inflammatory results on high-profile topics.”

28 In response to the investigation, a Google spokeswoman, Ms. Levin, told the *Journal*, “We

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1 do today what we have done all along, provide relevant results from the most reliable sources  
2 available.”

3 Google, which has more than 90% of the market share for online searches, is an extremely  
4 powerful company capable of controlling what people know and what they can learn online.

5 The *Journal* tested the word “abortion” in Google’s search engine and compared the results  
6 to Bing and DuckDuckGo’s results. According to the test, Planned Parenthood was featured in 39%  
7 of the results on the first page of Google’s results compared to 14% for Bing and 16% for  
8 DuckDuckGo.  
9

10 Ms. Levin responded to the test by claiming that Google does not promote Planned  
11 Parenthood through its algorithm, but the available evidence suggests otherwise.

12 Google has also [been exposed](#) by a former staffer who spoke with the undercover  
13 investigative organization Project Veritas. The staffer, Zachary Vorhies, claimed that Google has a  
14 “news blacklist” document which censors conservative websites such as LifeNews.com,  
15 Newsbusters and the Media Research Center.  
16

17 According to one researcher, Google even has the power to influence the results of an  
18 election. Indeed, they have already done so.

19 Dr. Robert Epstein, Ph.D., a senior research psychologist at the American Institute for  
20 Behavioral Research and Technology, is one of the lonely voices that has been speaking out about  
21 Google’s manipulation of search results. Dr. Epstein’s research has focused particularly on the  
22 impact of Google’s search result manipulation on elections.  
23

24 In a [testimony](#) before the Senate Judiciary Committee in June of 2019, Dr. Epstein claimed  
25 that, “In 2016, biased search results generated by Google’s search algorithm likely impacted  
26 undecided voters in a way that gave at least 2.6 million votes to Hillary Clinton (whom I  
27 supported).”  
28

Dr. Epstein also claimed that, “On Election Day in 2018, the “Go Vote” reminder Google



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1 displayed on its home page gave one political party between 800,000 and 4.6 million more votes  
2 than it gave the other party. In other words, Google's "Go Vote" prompt was *not* a public service; it  
3 was a *vote manipulation*."

4 The evidence Dr. Epstein provides is disconcerting, though not surprising.

5 In a leaked video following the election of President Donald Trump in 2016, Google  
6 executives held a staff meeting in which they conveyed significant remorse about the election  
7 results.

8 In the [video](#), Google co-founder Sergey Brin states, "I know this is probably not the most  
9 joyous TGIF (weekly meeting) we have had. Let's face it, most people here are pretty upset and  
10 pretty sad because of the election."

11 Brin goes on to say, "Myself, as an immigrant and refugee, I certainly find this election  
12 deeply offensive and I know many of you do too. And I think it's a very stressful time, and it  
13 conflicts with many of our values."

14 In the same meeting, Google CFO Ruth Porat broke down in tears recounting Hillary  
15 Clinton's loss that Tuesday evening. After texting a friend who was at what would have been  
16 Clinton's election night victory party, Porat said her friend responded, "People are leaving. Staff is  
17 crying. We're going to lose." With her voice trembling, Porat says, "Uh... that was first moment I  
18 really *felt* like we were going to lose, and it was this massive kick in the gut that we were going to  
19 lose."

20 Numerous other examples of liberal bias among Google's top executive team was  
21 demonstrated in the video, and what's remarkable is that there is not a single moment of  
22 conservative opinion expressed. The support for Clinton and the sense of dread seemed to be  
23 unanimous.

24 It couldn't be clearer that Google is an enormously influential company run by an entirely  
25 liberal executive team. And the *Journal's* excellent investigative work further exposes their  
26  
27  
28

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manipulative practices.

I think it's past time we consider whether using Google as our primary search engine, which most Americans do, is wise.

Google, Inc., isn't just the world's biggest purveyor of information; it is also the world's biggest censor.

The company maintains at least nine different blacklists that impact our lives, generally without input or authority from any outside advisory group, industry association or government agency. Google is not the only company suppressing content on the internet. Reddit has frequently been [accused](#) of banning postings on specific topics, and a [recent report](#) suggests that Facebook has been deleting conservative news stories from its newsfeed, a practice that might have a significant effect on public opinion – even on voting. Google, though, is currently the biggest bully on the block.

When Google's employees or algorithms decide to block our access to information about a news item, political candidate or business, opinions and votes can shift, reputations can be ruined and businesses can crash and burn. Because online censorship is entirely unregulated at the moment, victims have little or no recourse when they have been harmed. Eventually, authorities will almost certainly have to step in, just as they did when [credit bureaus](#) were regulated in 1970. The alternative would be to allow a large corporation to wield an especially destructive kind of power that should be exercised with great restraint and should belong only to the public: the power to shame or exclude.

***If Google were just another mom-and-pop shop with a sign saying "we reserve the right to refuse service to anyone," that would be one thing. But as the golden gateway to all knowledge, Google has rapidly become an essential in people's lives – nearly as essential as air or water. We don't let public utilities make arbitrary and secretive decisions about denying people services; we shouldn't let Google do so either.***

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Google venture capitalists and executives are exposed by looking up their names on [www.pacer.gov](http://www.pacer.gov). They have all been charged with sex trafficking, bribery, money laundering and revenge programs against their wives and business peers, ie:

<https://nypost.com/2021/08/20/google-founder-created-revenge-site-against-estranged-wife/>

*“ Google spies on competitors and steals their technology...”*

*“Google - Alphabet - YouTube stock is owned by almost all of the California politicians and their families and that is why Google - Alphabet - YouTube is never regulated and always protected by them for their political and profiteering manipulations...”*

*“Google runs tens of millions of dollars of defamation attacks against competitors...”*

*“Google hides all media and news coverage for competitors of Larry Page's boyfriend: Elon Musk...”*

*“Google lies to the public about what they really do with the public's data...”*

*“Google promotes illegal immigration in order to get cheap labor and control votes...”*

*“Google runs VC funding back-lists against start-ups that are competitive and has been sued by the feds over it...”*

*“Google bribes thousands of politicians in the USA, Europe and Asia...”*

*“Google is a criminal RICO-violating monopoly..”*

*“Google rigs the stock market with Flash-boy, Pump/Dump and Microblast SEC violating computer*

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1 *tricks..”*

2

3 *“Google pays bribes to politicians in Google and YouTube stock..”*

4

5 *“Google manipulates who gets to see what web-sites, globally, for competitor black-lists..”*

6

7 *“Google has a "no poaching" Silicon Valley jobs blacklist...”*

8

9 *“Google bosses sexually abuse women and young boys...”*

10

11 *“Google bosses run sex trafficking operations in the Epstein and NXVIUM sex cults...”*

12

13 *“Google bosses control the National Venture Capital Association financing cartel and order the*  
14 *black-listing of competitive start-ups...”*

15

16 *“Google has placed the majority of the corporate staff in the Obama White House...”*

17

18 *“Google controls national elections for anti-competitive purposes...”*

19

20 *“The company "**Polyhop**", in the HOUSE OF CARDS tv show, does all the crimes that Google*  
21 *actually does in reality...”*

22

23 *“Google's law firms, like Wilson Sonsini, are corrupt conduits for payola and political conduit-*  
24 *relays...”*

25

26 *“Google bribes some politicians with revolving door jobs...”*

27

28 *“Google is primarily responsible for destroying the Bay Area Housing opportunities...”*

1  
2 *“Google runs DDoS attacks on competitors by massively crawling their sites...”*

3  
4 *“Google boss Andy Rubin runs a sex slave farm according to his own family...”*

5  
6 *“Google boss Eric Schmidt was a philandering sex-penthouse owner according to vast news*  
7 *articles...”*

8  
9 *“Google executives hire so many hookers that at least one of them, Mr. Forrest Hayes, was killed*  
10 *by his hooker...”*

11  
12 *“Google executives sexually abuse so many women that the women staff of Google walked out one*  
13 *day...”*

14  
15 *“In the 2009 White House, you could not swing a cat without hitting a Google insider...”*

16  
17 *“Google has paid covert bribes, PAC funds, real estate and search rigging payola to every*  
18 *California Senator...”*

19 *“Google has paid bribes, through its lobby fronts, to halt FBI, SEC, FEC and FTC*  
20 *investigations of Google crimes...”*

21  
22 *“Google was funded by the CIA, via In-Q-Tel, a so called "501 c3 charity" which was caught with*  
23 *tons of cocaine...”*

24  
25 *“Google gets millions of dollars of taxpayer cash for spying on Americans inside the USA...”*

26  
27 *“Google's map service was a spy system paid for by taxpayers money that Google now profits off*  
28 *of...”*

1  
2 “Nancy Pelosi and Dianne Feinstein have promised to "protect" Google because their families  
3 profit off Google stocks...”

4  
5 “Payment receipts prove that Google and Gawker/Gizmodo exchanged cash and staff for Character  
6 Assassination attacks...”

7  
8 “Google VC's and bosses have spent \$30M+ rigging the U.S. Patent Office to protect Google and  
9 harm Google competitors...”

10 See the documentary video at:

11 [http://focus-book.com/public/The\\_Battle\\_to\\_Save\\_Inventing.m4v](http://focus-book.com/public/The_Battle_to_Save_Inventing.m4v)

12 [http://newsplus007.com/public/The\\_Battle\\_to\\_Save\\_Inventing.m4v](http://newsplus007.com/public/The_Battle_to_Save_Inventing.m4v)

13 ...and hundreds of other streaming sites.

14  
15 “Google bribed it's lawyer into position as head of the U.S. Patent office in order to have her  
16 protect Google...”

17  
18 “To rig insider stock trades, Google hides negative Tesla stories and pumps positive Tesla stories  
19 on "push days" coordinated to manipulate the stock market...”

20  
21 “Google and Elon Musk Co-own, co-invest and co-market stocks covertly while running anti-trust  
22 schemes...”

23  
24 “Google rarely likes, or hires, black employees per federal and news media investigations...”

25  
26 “Google hired most of the Washington, DC K Street lobby firms and told them to "do what ever  
27 they could"...”  
28

1 “The film: ***“Miss Sloane”*** ( <https://www.imdb.com/title/tt4540710/> ) depicts only 2% of the illicit  
2 lobbying tactics Google employs daily...”

3  
4 “Demands for an FTC and FBI raid of Google, for criminal activity, securities law and election  
5 felonies have been filed...”

6  
7 “Google's David Drummond had his Woodside, CA Quail Road house bugged revealing sexual  
8 dirty deeds with Google employees, political manipulations and financial misdeeds...”

9  
10 “Google, and it’s Cartel (Alphabet, Youtube, and hundreds of other shell-company facades) are a  
11 criminal organization engaged in felony-class crimes. Google’s bosses bribe politicians, regulators  
12 and law enforcement officials to hold off prosecution. At Google: Kent Walker, Andy Rubin, Larry  
13 Page, Eric Schmidt, Sergy Brin, Jared Cohen, Yasmin Green, David Drummond and Ian Fette are  
14 so enmeshed in sex scandals, election manipulation, and White House bribes that it is hard to  
15 comprehend how they can get any legitimate work done...”

16 “Between all of the sex cult activity; hookers; rent boys; political bribes to Pelosi, Harris,  
17 Newson, and Feinstein; DDoS attacks they run; CIA and NSA stealth deals; privacy harvesting;  
18 Scientology-like employee indoctrination; cheap Asian labor; covert Axiom scams and other illicit  
19 things they get up to; one just has to wonder. Some of the largest political bribes in American or  
20 European history were paid via billions of dollars of pre-IPO cleantech stock, insider trading, real  
21 estate, Google search engine rigging and shadow-banning, sex workers, revolving door jobs,  
22 nepotism, state-supported black-listing of competitors and under-the-table cash. Why are these  
23 Silicon Valley Oligarchs and their K-Street law firms and lobbyists immune from the law?...”

24  
25 “U.S. Senators, Agency Heads and Congress are bribed by Google intermediaries with: Billions of  
26 dollars of Google, Twitter, Facebook, Tesla, Netflix and Sony Pictures stock and stock warrants  
27 which is never reported to the FEC; Billions of dollars of Google, Twitter, Facebook, Tesla, Netflix  
28 and Sony Pictures search engine rigging and shadow-banning which is never reported to the FEC;

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1 *Free rent; Male and female prostitutes; Cars; Dinners; Party Financing; Sports Event Tickets;*  
2 *Political campaign printing and mailing services "Donations"; Secret PAC Financing; Jobs in*  
3 *Corporations in Silicon Valley For The Family Members of Those Who Take Bribes And Those Who*  
4 *Take Bribes; "Consulting" contracts from McKinsey as fronted pay-off gigs; Overpriced "Speaking*  
5 *Engagements" which are really just pay-offs conduited for donors; Private jet rides and use of*  
6 *Government fuel depots (ie: Google handed out NASA jet fuel to staff); Real Estate; Fake*  
7 *mortgages; The use of Cayman, Boca Des Tores, Swiss and related money-laundering accounts;*  
8 *The use of HSBC, Wells Fargo, Goldman Sachs and Deutsche Bank money laundering accounts*  
9 *and covert stock accounts; Free spam and bulk mailing services owned by Silicon Valley*  
10 *corporations; Use of high tech law firms such as Perkins Coie, Wilson Sonsini, MoFo, Covington &*  
11 *Burling, etc. to conduit bribes to officials; and other means now documented by us, The FBI, the*  
12 *FTC, The SEC, The FEC and journalists...."*

13 *"Google and Youtube are based on technology and business models that Google and*  
14 *YouTube stole from small inventors who had launched other companies that were up and operating*  
15 *before YouTube or Google even existed as business operations. Google holds the record for the*  
16 *largest number of corporate sex scandals, abuses and sex trafficking charges..."*

17 *"There are only two kinds of people that work at Google: 1.) Cult indoctrinated naive kids*  
18 *with odd sexual quirks and 2.) divisive managers and executives who seek to exploit those eco-*  
19 *chambered employees for nefarious political and stock market manipulation purposes under the*  
20 *Scientology-like guise of "doing good things", when, in fact, they are engaged in horrific crimes*  
21 *against society. Google has hired almost every technology law firm in order to "conflict them out"*  
22 *from ever working to sue Google. If Google rapes you, robs your patents or does anything awful,*  
23 *you won't be able to find a lawyer to help you. Most Google executives in control of Google have*  
24 *been indoctrinated by family dynasties to believe that any crime is justified by a bigger cause. Most*  
25 *of those executives are men. The few women in control of departments are figure-heads..."*

26 *"Google bosses attend the same parties and business meetings in which they collude, co-*  
27 *lobby, rig markets and make anti-trust violating plans together. Google is a private government*  
28 *with more money and power than most smaller nations. Google has more lobbyists bribing more*



1 *politicians than any other company in America..."*

2 *"Jared Cohen and fashion show-horse Yasmin Green at Google had the job of over-*  
3 *throwing countries in the Middle East. They openly bragged about it. (*  
4 *<https://truthstreammedia.com/2013/06/02/googles-regime-change-agent-jared-cohen/> )... People*  
5 *that work at Google get paid \$260,000.00+ per year to lie, spy, manipulate politics, bribe*  
6 *politicians and engage in other crimes. For that kind of money, a person will doing ANYTHING and*  
7 *rationalize it as "part of the higher cause"..."*

8 *"Google is the largest financier of the Obama political campaign and exceeded FEC*  
9 *campaign spending limits by tens of billions of dollars. Plaintiffs can prove this in a jury trial, a*  
10 *Grand Jury hearing and a live Congressional hearing. Google is the largest staffing source of the*  
11 *Obama Administration. Plaintiffs can prove this in a jury trial, a Grand Jury hearing and a live*  
12 *Congressional hearing. The largest number of laws and policy decisions, benefiting a single*  
13 *company and it's investors, went to: Google. Plaintiffs can prove this in a jury trial, a Grand Jury*  
14 *hearing and a live Congressional hearing..."*

15 *"Google, and it's investor's are the single largest beneficiary of the Obama Administration.*  
16 *Plaintiffs can prove this in a jury trial, a Grand Jury hearing and a live Congressional hearing..."*

17 *"The Obama Administration only won the White House because Google and Facebook*  
18 *engaged in the largest digital media and search engine manipulation in human history. Plaintiffs*  
19 *can prove this in a jury trial, a Grand Jury hearing and a live Congressional hearing..."*

20 *"Google, and it's investors, during the Obama Administration, had most of their competitors*  
21 *denied funding, grants, contracts and tax waivers while Google's investors GOT funding. Plaintiffs*  
22 *can prove this in a jury trial, a Grand Jury hearing and a live Congressional hearing and prove*  
23 *that Google coordinated anti-trust violations with senior Obama Administration White House*  
24 *staff...."*

25 *"...Damore reveals that Google operates it's staffing like a Scientology cult. They control*  
26 *their employees lives, information, transportation, free time, entertainment and social life. A Google*  
27 *life is a glass-bubble of echo-chamber extremist, hyper-sex-kink, reinforcement..."*

28 [Google Deletes Videos Accusing It of Election Manipulation from YouTube... Which It](#)

1 [Owns \(thefreethoughtproject.com\)](#)

2 by [fluxusp](#)

- 3 • [comments](#)

4 -

5 [With All These Big Tech Revelations, This Proves The 2018 Midterms Were Stolen.](#)  
6 [Devastating Project Veritas report sheds light on Google's collusion with Democrats. \(archive.fo\)](#)

7 by [GizaDog](#)

- 8 • [comments](#)

9  
10 [GOOGLE EXECS PANIC! Go Into Hiding - Delete Social Media Accounts After James](#)  
11 [O'Keefe's Latest Exposé \(thegatewaypundit.com\)](#)

12 by [libman](#)

- 13 • [comments](#)

14 -

15 [White House Slams Google As Veritas Censorship Controversy Escalates \(bitchute.com\)](#)

16 by [strange\\_69](#)

- 17 • [comment](#)

18  
19 [Google's NSA Again exposed For Unauthorized Collection Of Americans' Phone Records](#)  
20 [\(zerohedge.com\)](#)

21 by [Dirty Money](#)

- 22 • [comments](#)

23  
24 [What exactly is google's business model besides selling ads no one clicks on and selling](#)  
25 [people's data to the NSA? \(AskVoat\)](#)

26 by [GIF-ILL-SONG](#)

- 27 • [comments](#)

28

1        [So the "russian hackers" meddling in the election was Google all along. Why isn't this the](#)  
2 [biggest story in America right now? None of the "trusted" news sources have commented on this at](#)  
3 [all. \(politics\)](#)

4        by [shadow332](#)

- 5            • [comments](#)

6        -

7        [Google stealthily infuses political agenda into products to prevent Trump reelection,](#)  
8 [insiders, documents say. \(theepochtimes.com\)](#)

9        by [Ex-Reddit](#)

- 10           • [comments](#)

11       -

12       [Google Chrome is Tracking Your Every Move and Storing It, This is How to Stop It](#)  
13 [\(thefreethoughtproject.com\)](#)

14       by [fluxusp](#)

- 15           • [comments](#)

16       -

17       [Google Chrome Has Become Surveillance Software, It's Time to Switch | \(archive.fo\)](#)

18       by [MyOnlyAccount](#)

- 19           • [comments](#)

20       [Project Veritas](#) ( <https://www.projectveritas.com/> ) has been lifting back the veil covering  
21 big tech companies and their nefarious activities following the 2016 election. They tried to play left-  
22 leaning-but-mostly-fair before the 2016 election, believing in their hearts that Hillary Clinton would  
23 be President without their concerted meddling. That didn't work out for them, so they are trying to  
24 prevent "another Trump situation" in 2020 by unabashedly [purging, silencing, and censoring](#) (  
25 [https://noqreport.com/2019/05/08/purge-censor-silence-tech-giants-go-full-orwell-prepare-2020-](https://noqreport.com/2019/05/08/purge-censor-silence-tech-giants-go-full-orwell-prepare-2020-elections/)  
26 [elections/](#) ) on platforms like Facebook, Google, Twitter, Pinterest, Instagram, and YouTube.

27       (Article by Michio Hasai republished from [NOQReport.com](#))

28       The answers delivered today before Congress in response to questions by [Representative](#)

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[Dan Crenshaw](#) weren't the standard denials. They were politically manipulative answers designed to make it known they're doing what we've said they were doing all along, but they feel justified in doing it because "hate speech" must be stopped at all costs. Of course, what constitutes hate speech to the social justice warriors in big tech invariably circles around conservative thought. There is no form of hate speech short of physical threats that can be attributed to progressives, at least not in the minds of the people who control big tech. If conservatives are aggressive, they're delivering hate speech. If progressives are aggressive, they're just being truthful. That's what big tech thinks.

This is the worst-case scenario for conservatives. Before, we could call them liars and cheats. Now, we have to fight them on an ideological level, and while we have the truth on Plaintiffs side, they have the technology. They have the eyeballs. They control what people see and don't see. And as such, they can no longer be trusted to deliver anything even remotely close to fair and balanced. They're unhinged from reality, but instead of coming back to reality once exposed, they're building a new reality around their ideologies.

Russia may arrest Google employees for running Google as a manipulative service containing hidden political insertions affecting the human subconscious

- Russian government will now arrest those who try to 'control minds' via mass web manipulation
- Google was created to push liberal leftist political messages on the subconscious
- **Research exposes Google as insidious mind-control political skill**
- No matter your political persuasion, it is unfair and manipulative for Google to control minds ANY political purposes

By [Sophie Tanno For Mailonline](#)

A Russian journalist has been accused of 'controlling minds' and 'affecting the human subconscious' after referencing George Orwell's 1984 in an article.

Mikhail Romanov, a reporter for the Yakutsk Vecherniy weekly, was writing a story on the alleged torture of an academic.

Police in [Russia's](#) republic of Sakha charged Romanov after they suspected him of trying to tap into the readers' sub-conscience, Russian newspaper [Kommersant](#) reported.

1 Mikhail Romanov, a reporter for the Yakutsk Vecherniy weekly, was writing a story on the  
2 alleged torture of an academic (stock)

3 A Russian journalist has been accused of 'controlling minds' and 'affecting the human  
4 subconscious' after referencing George Orwell's 1984 (pictured) in an article

5 Romanov's editor told the publication: 'This is a story about how anyone can be squashed by  
6 the government machine.

7 'It's also about how Big Brother is watching, reading all comments on online forums.'

8 This is understood to be the first time a journalist will be tried under Russia's new legislation  
9 punishing those who are perceived to have published information 'containing hidden insertions  
10 affecting the human subconscious. '

11  
12 [2020 Election; Subliminal Google Messages to Alter Outcome ...](#)

13  <https://www.youtube.com/watch?v=LBmByyFkRlo>

14 Google, Facebook, Amazon, Microsoft, and Apple: these companies, the big 5, know almost  
15 everything about your life. They know what websites you go to, what y...

16  
17 [MSNBC segment on Hidden and Subliminal Messages Found In ...](#)

18  
19 [2020 Election; Subliminal Google Messages to Alter Outcome?](#)

20  [https://www.zachdrewshow.com/episodes/2020-election-subliminal-google-messages-to-  
22 alter-outcome/](https://www.zachdrewshow.com/episodes/2020-election-subliminal-google-messages-to-<br/>21 alter-outcome/)

23 Google manipulates your searches for you to be subconsciously swayed — let that sink in.  
24 We are dealing with that today. 2020 Election: Who Decides? Google meddling with the 2020  
25 election? We will cover it, but also go back in history and explain that this is NOT a new  
26 development. Manipulation, deception: It starts often as **subliminal**.

27 [Subliminal Messaging | Owlcation](#)

28  <https://owlcation.com/social-sciences/Subliminal-Messanging>

**Subliminal messages** are perceived by the unconscious brain. There is not as much **subliminal** messaging happening in the US now as previously reported, but there could be subtle **messages** that are received unconsciously. Messaging has probably been used by or **political** operatives, yet it may not work.

[7 Sneaky Subliminal Messages Hidden in Ads | Mental Floss](#)



[mentalfloss.com/article/67223/7-sneaky-subliminal-messages-hidden-ads](https://mentalfloss.com/article/67223/7-sneaky-subliminal-messages-hidden-ads)

The FCC fielded the incident, and subsequently condemned such tactics as being "contrary to the public interest"; it's believed to be the first example of **subliminal** advertising on television.

[17 Subliminal Messages You'd Never Notice in Everyday Life ...](#)



[https://www.cracked.com/photoplasty\\_386\\_17-subliminal-messages-youd-never-notice-in-everyday-life/](https://www.cracked.com/photoplasty_386_17-subliminal-messages-youd-never-notice-in-everyday-life/)

17 **Subliminal Messages** You'd Never Notice in Everyday Life ... Twitter. **Google** Plus. Stumble Upon. ... We asked you to show us your inner-Banksy by adding **subliminal** ...

[11 Shocking Messages Hidden In Your Childhood Cartoons](#)



<https://www.therichest.com/expensive-lifestyle/entertainment/11-shocking-messages-hidden-in-your-childhood-cartoons/>

11 Shocking **Messages** Hidden In Your Childhood Cartoons. The creative animators and screenwriters often insert **subliminal messages** into their work, and the examples can sometimes be more than unusual. Sexism, **political messages**, conspiracy theories and hidden inappropriate jokes are found in numerous cartoons that we all grew up with.

[What Are Subliminal Messages And Do They Work?](#)



<https://allthatsinteresting.com/what-are-subliminal-messages>

**Subliminal messages**, on the other hand, are likewise real and similar to supraliminal **messages** except that the signal or stimulus is below Plaintiffs threshold of conscious awareness. In other words, you cannot consciously perceive a **subliminal message**, even if you search for it.

**Google likely ‘thoroughly infiltrated’ by Chinese govt., expert warns**

([LifeSiteNews](#)) – Tech billionaire Peter Thiel recently called on the federal government to investigate Google for potential infiltration by the Chinese government, and now security experts

1 are saying his concerns are well-founded.

2 *Thiel, one of President Donald Trump's most high-profile [gay supporters](#) and an [avowed](#)*  
3 *[critic](#) of Silicon Valley, made the remarks at last weekend's National Conservatism Conference,*  
4 *[Axios reports](#). He called on the FBI and CIA to ask Google, "how many foreign intelligence*  
5 *agencies have infiltrated your Manhattan Project for AI"; "does Google's senior management*  
6 *consider itself to have been thoroughly infiltrated by Chinese intelligence"; and whether this*  
7 *alleged infiltration is why the company works with China's military but not America's.*

8 "I'm not sure quite how to put this, I would like them to be asked [these questions] in a not  
9 excessively gentle manner," Thiel added.

10 Alex Stamos, a researcher with the Stanford Internet Observatory and [former chief security](#)  
11 [officer at Facebook](#), ( <https://www.nytimes.com/2018/03/19/technology/facebook-alex-stamos.html>  
12 ) said Tuesday it was "completely reasonable" to assume that both the Chinese and Russian  
13 governments have, in some form or another, already infiltrated not only Google but every top tech  
14 company:

15 Note that "subverted" is very different than planting professional spies in "The Americans"  
16 style. Each of the big companies employs thousands of employees with family members under the  
17 control of these countries, and a gov request might be simple and seem borderline reasonable.

18 Stamos predicted that the "next couple of years" would see the revelation of a "major  
19 combined HUMINT/InfoSec [human intelligence/information security] attack against a major tech  
20 company."

21 He's not the only one who advises that Thiel's warnings be taken seriously. Richard Clarke,  
22 a former counterterrorism and cybersecurity advisor to both Democrat and Republican presidents,  
23 [told CNBC](#) ( [https://www.cnn.com/2019/07/17/ex-white-house-advisor-richard-clarke-thiel-right-](https://www.cnn.com/2019/07/17/ex-white-house-advisor-richard-clarke-thiel-right-on-google-and-china.html)  
24 [on-google-and-china.html](#) ) there was cause for concern.

25 "Here's what I think is true: Google refused to work for the Pentagon on artificial  
26 intelligence," Clarke said. "If you turn around and you work on artificial intelligence in China, and  
27 you don't really know what they're going to do with that, I think there's an issue."

28 The internet giant has denied working with the Chinese military, but opened an artificial

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1 intelligence center in Shanghai in 2017 despite the Communist regime's strict speech and internet  
2 controls. On Tuesday, Google executive Karan Bhatia [testified](#) (  
3 [https://www.technologyreview.com/f/613975/google-has-terminated-dragonfly-project-to-build-a-](https://www.technologyreview.com/f/613975/google-has-terminated-dragonfly-project-to-build-a-search-engine-for-china/)  
4 [search-engine-for-china/](#) ) to the Senate Judiciary Committee that the company has terminated a  
5 [controversial](#) ( [https://www.lifesitenews.com/news/google-researcher-resigns-in-protest-of-](https://www.lifesitenews.com/news/google-researcher-resigns-in-protest-of-companys-plan-to-aid-censorship)  
6 [companys-plan-to-aid-censorship](#) ) censored search engine it had been working on for China.

7 Clarke added that there was no meaningful distinction between Google working with  
8 Chinese companies and the Chinese government, given the level of state control in the country.

9 The specter of foreign influence on the tech industry further intensifies its ongoing  
10 controversies regarding [political bias and censorship](#) ( [https://www.lifesitenews.com/news/google-](https://www.lifesitenews.com/news/google-denies-blacklisting-under-oath-despite-leaked-docs-showing-otherwise)  
11 [denies-blacklisting-under-oath-despite-leaked-docs-showing-otherwise](#) ) and [violations of user](#)  
12 [privacy](#) ( [https://www.lifesitenews.com/news/facebook-5-billion-fine-for-privacy-scandals-too-](https://www.lifesitenews.com/news/facebook-5-billion-fine-for-privacy-scandals-too-low-democrats-complain)  
13 [low-democrats-complain](#) ) . Responding to Thiel's original comments, President Trump [said](#)  
14 ( <https://twitter.com/realDonaldTrump/status/1151095675213553664> ) that his administration will  
15 "take a look" at the matter.

16 [\[-\] gazillions](#)

17 "Google being biased is glaringly obvious even to a retard. Google forcing their employees  
18 to support them politically is a human rights violation. The old railroad barons a hundred years ago  
19 were bad people, but no where near as abusive as google is to the employees. The old railroad  
20 tycoons had their supporters too who thought strikers and protesters against their tyranny were  
21 awful people. Silicon Valley just indoctrinated their followers and employees by brainwashing them  
22 first like any cult does. "Do no evil" was always a smarmy block of shit in pixels, no different than  
23 the purple dinosaur singing "I love you, you love me". The purple dinosaur never loved you one  
24 little bit. It was a lie, and parents had no business being such gullible suckers and allowing their  
25 children to be lied to by an actor in a fuzzy suit..."

- 26 • <https://voat.co/v/news/3348671/19866570>

27 [\[-\] gerald-o](#)

28 forcing their employees to support them politically is a human rights violation.



1 > Civil and political rights are a class of rights that **protect individuals' freedom** from  
 2 infringement by governments, social organizations, and private individuals. They ensure one's  
 3 **entitlement to participate in the civil and political** life of the society and state **without**  
 4 **discrimination or repression.**

5 From the first time they censored, shadow-banned people who opposed their way of viewing  
 6 world, far-left, SJW, leftards has put cornerstone to **civil rights movement 2.0**, including people  
 7 who are at the rock bottom and uppermost stairs of oppression. Clearly, this is infringement of rights  
 8 by gov and private entities, which has been ignored from by the time it was apparent that such  
 9 violation is well spread and not a unique case.

10 Those at silicon valley had no idea that their attempt to have conservative and alike voice  
 11 removed/deplatformed is **someway resemble how "white" and "colored" segregation works**;  
 12 which is no brainer considering that they did not pay any attention to "obscure" details and only  
 13 remember famous persons who was oppressed at that time.

14 So, don't spout only " Hate speech is Freee speech". Tell them that when some peers mock  
 15 center-right personalities by reenacting what happened prior to Civil Rights Act of 1968,throwing  
 16 liquids to nigger who ignored the sign, isn't a good joke since **political affiliation is covered in**  
 17 **protected class** in District of Columbia, IA,WV state, which put them as the white fellas and anyone  
 18 who didn't entirely agree with them as the blacks in this reenactment.

19 If anyone reading this is somehow connected to parliament from local council to state,  
 20 **consider ammending the laws to add political affiliation as one of class covered by**  
 21 **"(unfounded)hate crimes"**. We won't need to see bike lock attacker and his copycat got sweetheart  
 22 deals. Share this to Trump, since who doesn't love for shit and giggles watching leftards kvetching  
 23 having cognitive dissonance episode explaining why adding another class would hurt other classes  
 24 that already existed in last statue"

25 In creating Google, Larry Page, Eric Schmidt, Sergy Brin and Rajeev Motwani worked out a  
 26 way for get government cash to fund a political manipulation company which only manipulated  
 27 politics that put profits in the pockets of Larry Page, Eric Schmidt, Sergy Brin and Rajeev Motwani.

28 The founders knew they could spy on every voter and control those voters without their

knowledge. In an epic web security study, it was revealed that Google exploited the following:

***“...You probably can't imagine the second-by-second dangers and harms that Google's empire uses modern electronics, like your phone and tablet, are causing to your life, your income, your privacy, your beliefs, your human rights, your bank account records, your political data, your job, your brand name, your medical data, your dating life, your reputation and other crucial parts of your life.***

Any use of a dating site, Google or Facebook product, social media site, movie site, or anything that you log in to, puts you at substantial risk. Remember: ***"if it has a plug, it has a bug"***. Every electronic device can be easily made to spy on you in ways you cannot possibly imagine.

**The Take-Aways:**

- Stalkers can find you by zooming in on your pupil reflection images in your online photos ( <https://www.kurzweilai.net/reflected-hidden-faces-in-photographs-revealed-in-pupil> )
- If you send email overseas or make phone calls overseas all of your communications, and those with anybody else, are NSA monitored ( <https://www.privacytools.io/> )
- Bad guys take a single online photo of you and put it in software that instantly builds a dossier on you by finding where every other photo of you is that has ever been posted online ( <https://www.aclu.org/blog/privacy-technology/surveillance-technologies/apples-use-face-recognition-new-iphone> )
- Face-tracking software for stalking you on Match.com and OK Cupid is more effective than even FBI software for hunting bank robbers ( <https://www.cnet.com/news/clearview-app-lets-strangers-find-your-name-info-with-snap-of-a-photo-report-says/> )
- Any glass, metal or ceramic object near you can be reflecting your voice or image to digital beam scanners that can relay your voice or image anywhere in the world
- All your data from any hotel you stay at will eventually be hacked and leaked ( [Info of 10 MILLION MGM guests including Justin Bieber and TWITTER CEO leaked online!](#) )
- Your voting data will be used to spy on you and harm you ( [Every voter in Israel just had their data leaked in 'grave' security breach...](#) )
- Lip-reading software can determine what you are saying from over a mile away (

1 [https://www.telegraph.co.uk/news/2020/01/20/russian-police-use-spy-camera-film-opposition-](https://www.telegraph.co.uk/news/2020/01/20/russian-police-use-spy-camera-film-opposition-activist-bedroom/)  
 2 [activist-bedroom/](https://www.telegraph.co.uk/news/2020/01/20/russian-police-use-spy-camera-film-opposition-activist-bedroom/) )

3 - Every Apple iPhone and other smart-phone has over 1000 ways to bug you, listen to you, track  
 4 you and record your daily activities even when you think you have turned off the device. Never  
 5 leave your battery in your phone. ( [LEAKED DOCS: Secretive Market For Your Web History...](#) )  
 6 ( [Every Search. Every Click. On Every Site...](#) )

7 - Elon Musk's SpaceX StarLink satellites are spy satellites that send your data to Google and other  
 8 tech companies ( [https://www.chieftain.com/news/20200118/first-drones-now-unexplained-lights-](https://www.chieftain.com/news/20200118/first-drones-now-unexplained-lights-reported-in-horsetooth)  
 9 [reported-in-horsetooth](https://www.chieftain.com/news/20200118/first-drones-now-unexplained-lights-reported-in-horsetooth) )

10 - Google and Facebook have all of your medical records and they are part of a political operation ( [https://www.wsj.com/articles/hospitals-give-tech-giants-access-to-detailed-medical-records-](https://www.wsj.com/articles/hospitals-give-tech-giants-access-to-detailed-medical-records-11579516200)  
 11 [11579516200](https://www.wsj.com/articles/hospitals-give-tech-giants-access-to-detailed-medical-records-11579516200) )

13 - Every dating site, comments section and social media site sends your private data, covertly, to  
 14 government, political campaigns and corporate analysis groups and can also be hacked by anyone.

15 - Any hacker can hack ANY network with even a single Intel, Cisco, Juniper Networks or AMD  
 16 motherboard on it and nobody can stop them unless they destroy the motherboard because the  
 17 back-doors are built into the hardware. Many of the companies you think are providing security are  
 18 secretly owned by the Chinese government spy agencies or the CIA ( <https://boingboing.net/2020/02/11/cia-secretly-owned-worlds-to.html> )

20 - Warehouses in Nigeria, Russia, Ukraine, Sao Paolo, China and hundreds of other regions, house  
 21 tens of thousands of hackers who work around the clock to try to hack you and manipulate your  
 22 data.

23 - Every red light camera, Walmart/Target/Big Box camera and every restaurant camera goes off to  
 24 networks that send your activities to credit companies, collection companies, political parties and  
 25 government agencies ( ['Homeland Security' using location data from apps to track millions of people...](#) )

26 - Match.com, OKCupid and Plenty of Fish are also DNC voter analysis services that read your texts  
 27 and keep your profiles forever

28 - If you don't put fake ages, addresses, phone numbers and disposable email addresses on ANY form

1 you fill out electronically, it will haunt you forever (

2 <https://www.the-sun.com/news/284784/pornstar-data-breach-massive-leak-bank-details/> )

3 - Every train, plane and cruise line records you constantly and checks the covert pictures they take  
4 of you against global databases. Corporations grab your collateral private data that those Princess  
5 Cruises and United Airlines companies take and use them to build files on you (

6 <https://www.silive.com/news/2020/01/report-new-app-can-id-strangers-with-a-single-photo.html> )

7 - The people who say "nobody would be interested in me" are the most at risk because their naiveté  
8 puts them at the top-of-the-list for targeting and harvesting ( [https://www.cnet.com/news/clearview-](https://www.cnet.com/news/clearview-app-lets-strangers-find-your-name-info-with-snap-of-a-photo-report-says/)  
9 [app-lets-strangers-find-your-name-info-with-snap-of-a-photo-report-says/](https://www.cnet.com/news/clearview-app-lets-strangers-find-your-name-info-with-snap-of-a-photo-report-says/) )

10 - Silicon Valley tech companies don't care about your rights, they care about enough cash for their  
11 executives to buy hookers and private islands with. Your worst enemy is the social media CEO.  
12 They have a hundred thousand programmers trying to figure out more and more extreme ways to  
13 use your data every day and nobody to stop them

14 - The government can see everywhere you went to in the last year (

15 <https://www.protocol.com/government-buying-location-data> )

16 There have been over 15,000 different types of hacks used against over 3 billion "average"  
17 consumers. EVERY one of them thought they were safes and that nobody would hack them because  
18 "nobody cared about them". History has proven every single one of them to have been totally  
19 wrong!

20 If you are smart, and you read the news, you will know that you should ditch all of your  
21 electronic devices and "data-poison" any information about you that touches a network by only  
22 putting fake info in all conceivable forms and entries on the internet. You, though, may be smart but  
23 lazy, like many, and not willing to step outside of the bubble of complacency that corporate  
24 advertising has surrounded you with.

25 Did you know that almost every dating and erotic site sends your most private life  
26 experiences and chat messages to Google's and Facebook's investors?

27 <https://www.businessinsider.com/facebook-google-quietly-tracking-porn-you-watch-2019-7>

28 Do you really want all of those Silicon Valley oligarchs that have been charged with sexual

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1 abuse and sex trafficking to know that much about you?

2       Never, Ever, put your real information on Youtube, Netflix, LinkedIn, Google, Twitter,  
3 Comcast, Amazon and any similar online service because it absolutely, positively will come back  
4 and harm you!

5       Always remember: Anybody that does not like you can open, read and take any photo, data,  
6 email or text on EVERY phone, computer, network or electronic device you have ever used no  
7 matter how "safe" you think your personal or work system is! They can do this in less than a minute.  
8 Also: Hundreds of thousands of hackers scan every device, around the clock, even if they never  
9 heard of you, and will like your stuff just for the fun of causing trouble. Never use an electronic  
10 device unless you encrypt, hide and code your material! One of the most important safety measures  
11 you can take is to review the security info at: <https://www.privacytools.io/>

12  
13 Those people who think: "I have nothing to worry about..I am not important" ARE the people who  
14 get hacked the most. Don't let naivete be your downfall. (  
15 [https://www.eff.org/deeplinks/2019/07/when-will-we-get-full-truth-about-how-and-why-](https://www.eff.org/deeplinks/2019/07/when-will-we-get-full-truth-about-how-and-why-government-using-facial-recognition)  
16 [government-using-facial-recognition](https://www.eff.org/deeplinks/2019/07/when-will-we-get-full-truth-about-how-and-why-government-using-facial-recognition) )

17       All of your info on Target, Safeway, Walgreens has been hacked and read by many  
18 outsiders. NASA, The CIA, The NSA, The White House and all of the federal background check files  
19 have been hacked. The U.S. Government has been hacked hundreds of times. All of the dating sites  
20 have been hacked and their staff read all of your messages. Quest labs blood test data and sexual  
21 information reports have been hacked and published to the world. There is no database that can't  
22 be easily hacked. Every computer system with Intel, AMD, Juniper Networks, Cisco and other  
23 hardware in it can be hacked in seconds with the hardware back-doors soldered onto their  
24 electronic boards. All of the credit reporting bureaus have been hacked. Wells Fargo bank is  
25 constantly hacked. YOU ARE NOT SAFE if you put information on a network. NO NETWORK is  
26 safe! No Silicon Valley company can, or will, protect your data; mostly because they make money  
27 FROM your data!

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1 Every single modern cell phone and digital device can be EASILY taken over by any hacker and  
2 made to spy on you, your family, your business and your friends in thousands of different ways.  
3 Taking over the microphone is only a small part of the ways a phone can be made to spy on you.  
4 Your phone can record your location, you voice vibrations, your mood, your thoughts, your sexual  
5 activity, your finances, your photos, your contacts (who it then goes off and infects) and a huge  
6 number of other things that you don't want recorded.

7 [Privacy watchdog under pressure to recommend facial recognition ban...](#)

8  
9 [Alarming Rise of Smart Camera Networks...](#)

10  
11 [AMAZON's Ring Doorbell Secretly Shares Private User Data With FACEBOOK...](#)

12  
13 The worst abusers of your privacy, personal information, politics and psychological information  
14 intentions are: Google, Facebook, Linkedin, Amazon, Netflix, Comcast, AT&T, Xfinity, Match.com  
15 & the other IAC dating sites, Instagram, Uber, Wells Fargo, Twitter, Paypal, Hulu, Walmart,  
16 Target, YouTube, PG&E, The DNC, Media Matters, Axiom, and their subsidiaries. Never, ever,  
17 put accurate information about yourself on their online form. Never, ever, sign in to their sites using  
18 your real name, phone, address or anything that could be tracked back to you.

19 If you don't believe that every government hacks citizens in order to destroy the reputation  
20 of anyone who makes a public statement against the current party in power then read the public  
21 document at: [https://www.cia.gov/library/readingroom/docs/CIA-RDP89-01258R000100010002-](https://www.cia.gov/library/readingroom/docs/CIA-RDP89-01258R000100010002-4.pdf)  
22 [4.pdf](https://www.cia.gov/library/readingroom/docs/CIA-RDP89-01258R000100010002-4.pdf)

23 That document shows you, according to the U.S. Congress, how far things can go.

24 A program called ACXIX hunts down all of your records from your corner pharmacy, your  
25 taxi rides, your concert tickets, your grocery purchases, what time you use energy at your home,  
26 your doctor records...and all kinds of little bits of info about you and puts that a file about you. That  
27 file about you keeps growing for the rest of your life. That file sucks in other files from other data  
28 harvesting sites like Facebook and Google: FOREVER. The information in that file is used to try to

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1 control your politics and ideology.

2       In recent science studies cell phones were proven to exceed radiation safety limits by as high  
3 as 11 times the 2-decade old allowable U.S. radiation limits when phones touch the body. This is  
4 one of thousands of great reasons to always remove the battery from your cell phone when you are  
5 not talking on it. A phone without a battery in it can't spy on you and send your data to your  
6 enemies.

7  
8 ***If you are reading this notice, the following risks apply to you, Thanks to the Silicon Valley***  
9 ***oligarchs:***

10  
11 1. EVERY network is known to contain Intel, Cisco, Juniper Networks, AMD, Qualcomm and other  
12 hardware which has been proven to contain back-door hard-coded access to outside parties. This is  
13 a proven, inarguable fact based on court records, FISA data, IT evidence, national news  
14 broadcasts, Congressional presented evidence and inventory records, ie: Krebs On Security,  
15 FireEye, ICIJ, Wikileaks Vault 9, EU, Global IT services, FBI.

16  
17 2. Chinese, Russian FSB, Iranian and other state-sponsored hacking services as well as 14 year old  
18 domestic boys are able to easily enter your networks, emails and digital files because of this. They  
19 can enter your network at any time, with less than 4 mouse clicks, using software available to  
20 anyone. This is a proven, inarguable fact based on court records, FISA data, IT evidence and  
21 inventory records, ie: Krebs On Security, FireEye, ICIJ, Wikileaks Vault 9, EU, Global IT services,  
22 FBI.

23  
24 3. Your financial office is aware of these facts and has chosen not to replace all of the at-risk  
25 equipment, nor sue the manufacturers who sold your organization this at risk equipment. They  
26 believe that the hassle and cost of replacement and litigation is more effort than the finance  
27 department is willing to undertake. This is a proven, inarguable fact based on court records, FISA  
28 data, IT evidence, national news broadcasts, Congressional presented evidence and inventory



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1 records, ie: Krebs On Security, FireEye, ICIJ, Wikileaks Vault 9, EU, Global IT services, FBI.

2  
3 4. In addition to the existing tools that were on the internet, in recent years, foreign hackers have  
4 released all of the key hacking software that the CIA, DIA and NSA built to hack into any device.  
5 These software tools have already been used hundreds of times. Now the entire world has access to  
6 these tools which are freely and openly posted across the web. This is a proven, inarguable fact  
7 based on court records, FISA data, IT evidence, national news broadcasts, Congressional presented  
8 evidence and inventory records, ie: Krebs On Security, FireEye, ICIJ, Wikileaks Vault 9, EU,  
9 Global IT services, FBI.

10  
11 5. The computers, servers, routers, cell phones, IP cameras, IP microphones, Smart Meters,  
12 Tesla's, "Smart Devices:", etc. and other devices openly broadcast their IP data and availability on  
13 the internet. In other words, many of your device broadcast a "HERE I AM" signal that can be  
14 pinged, scanned, spidered, swept or, otherwise, seen, like a signal-in-the-dark from anywhere on  
15 Earth and from satellites overhead. Your devices announce that they are available to be hacked, to  
16 hackers. This is a proven, inarguable fact based on court records, FISA data, IT evidence, national  
17 news broadcasts, Congressional presented evidence and inventory records, ie: Krebs On Security,  
18 FireEye, ICIJ, Wikileaks Vault 9, EU, Global IT services, FBI.

19  
20 6. It is bad policy for your organization, or any organization, to think they are immune or have IT  
21 departments that can stop these hacks. NASA, The CIA, The White House, EQUIFAX, The  
22 Department of Energy, Target, Walmart, American express, etc. have been hacked hundreds of  
23 times. This is a proven, inarguable fact based on court records, FISA data, IT evidence, national  
24 news broadcasts, Congressional presented evidence and inventory records, ie: Krebs On Security,  
25 FireEye, ICIJ, Wikileaks Vault 9, EU, Global IT services, FBI.

26  
27 7. The thinking: "Well, nobody would want to hack us", or "We are not important enough to get  
28 hacked" is the most erroneous and negligent thinking one could have in the world today. Chinese,



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1 Russian and Iranian spy agencies have a global “Facebook for blackmail” and have been sucking  
2 up the data of every entity on Earth for over a decade. If the network was open, they have the data  
3 and are always looking for more. The same applies to Google and Facebook who have based their  
4 entire business around domestic spying and data re-sale. This is a proven, inarguable fact based on  
5 court records, FISA data, IT evidence, national news broadcasts, Congressional presented evidence  
6 and inventory records, ie: Krebs On Security, FireEye, ICIJ, Wikileaks Vault 9, EU, Global IT  
7 services, FBI.

8  
9 8. You are a “Stepping Stone” doorway to other networks and data for targeted individuals and  
10 other entities. Your networks provide routes into other people’s networks. The largest political  
11 industry today is called “Doxing” and “Character Assassination”. Billions of dollars are expended  
12 by companies such as IN-Q-Tel - (DNC); Gawker Media - (DNC); Jalopnik - (DNC); Gizmodo  
13 Media - (DNC); K2 Intelligence - (DNC); WikiStrat - (DNC); Podesta Group - (DNC); Fusion GPS  
14 - (DNC/GOP); Google - (DNC); YouTube - (DNC); Alphabet - (DNC); Facebook - (DNC); Twitter  
15 - (DNC); Think Progress - (DNC); Media Matters - (DNC); Black Cube - (DNC); Mossad - (DNC);  
16 Correct The Record - (DNC); Sand Line - (DNC/GOP); Blackwater - (DNC/GOP); Stratfor -  
17 (DNC/GOP); ShareBlue - (DNC); Wikileaks (DNC/GOP); Cambridge Analytica - (DNC/GOP); Sid  
18 Blumenthal- (DNC); David Brock - (DNC); PR Firm Sunshine Sachs (DNC); Covington and  
19 Burling - (DNC), BuzzFeed - (DNC) Perkins Coie - (DNC); Wilson Sonsini - (DNC) and hundreds  
20 of others to harm others that they perceive as political, personal or competitive threats. Do not  
21 under-estimate your unintended role in helping to harm others. This is a proven, inarguable fact  
22 based on court records, FISA data, IT evidence, national news broadcasts, Congressional presented  
23 evidence and inventory records, ie: Krebs On Security, FireEye, ICIJ, Wikileaks Vault 9, EU,  
24 Global IT services, FBI.

25  
26 9. NEVER believe that you are too small to be noticed by hackers. Parties who believe that are the  
27 hackers favorite targets. This is a proven, inarguable fact based on court records, FISA data, IT  
28 evidence, national news broadcasts, Congressional presented evidence and inventory records, ie:

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1 *Krebs On Security, FireEye, ICIJ, Wikileaks Vault 9, EU, Global IT services, FBI.*

2  
3 *10. NEVER believe that because the word "DELL" or "IBM" or "CISCO" is imprinted on the*  
4 *plastic cover of some equipment that you are safe. Big brands are targeted by every spy agency on*  
5 *Earth and are the MOST compromised types of equipment. This is a proven, inarguable fact based*  
6 *on court records, FISA data, IT evidence, national news broadcasts, Congressional presented*  
7 *evidence and inventory records, ie: Krebs On Security, FireEye, ICIJ, Wikileaks Vault 9, EU,*  
8 *Global IT services, FBI.*

9  
10 *11. YOU may not personally care about getting exposed but the person, or agency, you allow to get*  
11 *exposed will be affected for the rest of their lives and they will care very much and could sue you*  
12 *for destroying them via negligence. Be considerate of others in your "internet behavior". Do not*  
13 *put anything that could hurt another on any network, ever. This is a proven, inarguable fact based*  
14 *on court records, FISA data, IT evidence, national news broadcasts, Congressional presented*  
15 *evidence and inventory records, ie: Krebs On Security, FireEye, ICIJ, Wikileaks Vault 9, EU,*  
16 *Global IT services, FBI.*

17  
18 *12. Never post your real photograph online, or on a dating site social media or on any network.*  
19 *There are thousands of groups who scan every photo on the web and cross check those photos in*  
20 *their massive databases to reveal your personal information via every other location your photo is*  
21 *posted. These "image harvesters" can find out where you, who your friends and enemies are and*  
22 *where your kids are in minutes using comparative image data that they have automated and*  
23 *operating around the clock. This is a proven, inarguable fact based on court records, FISA data, IT*  
24 *evidence, national news broadcasts, Congressional presented evidence and inventory records, ie:*  
25 *Krebs On Security, FireEye, ICIJ, Wikileaks Vault 9, EU, Global IT services, FBI.*

26  
27 *13. If you think using web security measures like this makes you "paranoid", then think again.*  
28 *Cautious and intelligent people use these security measures because these dangers are proven in*

1 the news headlines daily. Uninformed, naive and low IQ people are the types of people who do not  
2 use good web hygiene and who suffer because they are not cautious and are not willing to consider  
3 the consequences of their failure to read the news and stay informed.

4 ***‘Gotham’ software written by Palantir shows how government agencies, or anybody, can***  
5 ***use very little information to obtain quick access to anyone’s personal minutiae....”***

6  
7 **Google is a criminally corrupt organization:**

8 From INSIDE Google, Plaintiffs team saw Google manipulate the entire internet to hype up  
9 Larry Page's "boyfriend": Elon Musk and Tesla, which Google execs owned a portion of, while  
10 sabotaging Tesla's competitors. Google illicitly and illegally timed these manipulations with stock  
11 market pump-and-dump efforts to exploit insider trading. That is a felony violation of RICO,  
12 Antitrust and other laws. Every single thing that Google does is contrived to harm a competitor, a  
13 politician, an employee whistle-blower or some other business adversary. There are no "bugs",  
14 "operator errors", "server anomalies" or other media "accidents" at Google. Everything Google does  
15 is contrived, at a psychological warfare kind of level, to change a social perception.

16 Google must show its software to FBI, SEC, FTC and Plaintiffs search engine optimization  
17 experts to prove that they did not engage in these crimes. The fact is: Plaintiffs can prove they did  
18 the crimes and FBI experts can help us prove it!

19 In a similar case unfolding in Britain over whether Google wrongly demoted price  
20 comparison rival Foundem from its search results in favour of paid-for adverts, Google must now  
21 decide which it values more: the algorithms that rank its search results, or its stance that manually  
22 fiddling with those results to promote its own paid-for products over rivals' sites doesn't break  
23 competition laws.

24 High Court judge Mr Justice Roth [posed the stark question](https://www.bailii.org/ew/cases/EWHC/Ch/2020/657.html) (  
25 <https://www.bailii.org/ew/cases/EWHC/Ch/2020/657.html> ) to Google's lawyers in mid-March, just  
26 as the global coronavirus situation began triggering governmental responses in the West.

27 Foundem had asked for legal permission to bring in independent expert Philipp Klöckner to  
28 read confidential documents disclosed by Google in court.

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1 Those documents were court exhibits filed by Google engineers Cody Kwok and Michael  
2 Pohl. They sought, as the judge put it, "to explain the operation and aims of Google's ranking  
3 algorithms, and how they have been applied to shopping comparison sites generally and Foundem  
4 in particular".

5 Foundem has been pursuing Google since 2006, when [a flip of the switch at Mountain View](https://www.theregister.co.uk/2009/11/19/google_hand_of_god/)  
6 ( [https://www.theregister.co.uk/2009/11/19/google\\_hand\\_of\\_god/](https://www.theregister.co.uk/2009/11/19/google_hand_of_god/) ) caused the price-comparison  
7 site to vanish down Google's search rankings. Foundem argues that Google's demotion of it was a  
8 deliberate act to penalise a commercial rival and an abuse of Google's dominant market position.

9 Google denies this and is defending a High Court claim from Foundem as well as an EU  
10 competition investigation triggered by the website. The High Court case is stuck at a very early  
11 stage, despite having been filed in 2012, [thanks to the EU investigation](https://www.theregister.co.uk/2015/04/02/lawsuit_against_google_delayed_by_eu_commish/). (

12 [https://www.theregister.co.uk/2015/04/02/lawsuit\\_against\\_google\\_delayed\\_by\\_eu\\_commish/](https://www.theregister.co.uk/2015/04/02/lawsuit_against_google_delayed_by_eu_commish/) )

13 Foundem's lawyers, the company argued in the High Court, wouldn't be able to understand  
14 the technical algorithm evidence without having an SEO expert on hand. While not disputing this,  
15 Google strongly objected to Klöckner because he is a working SEO consultant: the Chocolate  
16 Factory is terrified of the SEO industry getting a proper glimpse under the bonnet and seeing how  
17 the search engine really operates. It told Mr Justice Roth:

18 The integrity of Google's ranking processes relies upon all webmasters or website owners  
19 having the same degree of access to information about Google's ranking... This will no longer be the  
20 case if information of this kind is made available to some individuals offering commercial services  
21 to assist companies to improve their Search ranking.

22 It also claimed Klöckner was potentially biased against it because he had done work for  
23 Trivago and Visual Meta, two firms that previously complained to the EU Commission about  
24 Google's anti-competitive practices.

25 Foundem suggested Google could simply withdraw the evidence so nobody would need to  
26 read it, while Google dug in and insisted the evidence was vital to help prove its case that nothing  
27 bad was done here. Thus Mr Justice Roth gave the adtech monolith a choice. Either it could  
28 withdraw the evidence as Foundem suggested, or it could agree to let Klöckner read the algorithm

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papers. The SEO expert would be given legal permission to enter two so-called confidentiality rings where he could read unredacted copies of the documents and talk to lawyers about them.

"If Google maintains its present course, then for the reasons I have explained I will grant the application that Mr Klöckner be admitted to those two rings until further order," said the judge! Plaintiffs are strongly advocating for full Court review of Google's manipulations in every possible Court.

Google is a criminal operation. It's executives have been publicly exposed as participants in horrific sex scandals, money laundering, political bribery and racism. It is time for the bought and paid shill politicians to stop protecting them!

One of the "Godfather's" of the Silicon Valley Cartel is Eric Schmidt. He is typical of the Cartel bosses that know each other, date each other, party together, use the same lawyers, get involved in the same sex scandals and lawsuits and pay stock bribes to the same politicians.

Subject: More DWS Call Sheets

To: Frank, Carla <FrankC@dnc.org> ☆

RoseAnn Rotando- she is interested in attending the Roundtable and wants to know where the funds will be used.  
Eric Schmidt- we want to add a few lines to his call sheet. He already maxed to the NRSC and the DSCC but he hasn't given to us yet this year. He should max to us because he is on the DNC task force team.  
Larry Birenbaum - He and his wife Jan can both write max out checks. Lets offer them both seats at the Roundtable for 50k  
David Drummond -  
Judy Estrin-  
Steven Goldby  
Terry Kramer  
Helen Raiser  
John Scully  
Sandi Thompson

Erik Stowe  
Democratic National Committee  
Northern California Finance Director  
(o) 202-488-5096 || (c) 202-431-8150



<https://my.democrats.org/NorCal2013>

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1 In July 2016, Raymond Thomas, a four-star general and head of the U.S. Special Operations  
2 Command, hosted a guest: Eric Schmidt, the chairman of Google.

3 General Thomas, who served within the 1991 gulf war and deployed many times to  
4 Afghanistan, spent the higher half of a day showing Mr. Schmidt around Special Operations  
5 Command's headquarters in Tampa, Fla. They scrutinized prototypes for a robotic exoskeleton suit  
6 and joined operational briefings, which Mr. Schmidt needed to study extra about as a result of he  
7 had recently begun advising the military on technology.

8 After the go-to, as they rode in a Chevy Suburban towards an airport, the conversation  
9 turned to a form of artificial intelligence.

10 "You absolutely suck at machine learning," Mr. Schmidt informed General Thomas, the  
11 officer recalled. "If I got under your tent for a day, I could solve most of your problems." General  
12 Thomas said he was so offended that he needed to throw Mr. Schmidt out of the car, however  
13 refrained.

14 Four years later, Mr. Schmidt, 65, has channeled his blunt assessment of the military's tech  
15 failings into a private campaign to revamp America's defense forces with extra engineers, extra  
16 software program and extra A.I. In the method, the tech billionaire, who [left Google last year](https://www.nytimes.com/2019/04/30/business/alphabet-board-eric-schmidt-diane-greene.html),  
17 ( <https://www.nytimes.com/2019/04/30/business/alphabet-board-eric-schmidt-diane-greene.html> )  
18 has reinvented himself because of the prime liaison between Silicon Valley and the national security  
19 community.

20 Mr. Schmidt now sits on two government advisory boards aimed toward bounce beginning  
21 technological innovation in the Defense Department. His confidants embrace former Secretary of  
22 State Henry Kissinger and ex-Deputy Defense Secretary Robert Work. And by means of his  
23 personal enterprise capital agency and a \$13 billion fortune, Mr. Schmidt has invested millions of  
24 {dollars} into more than half a dozen defense start-ups.

25 In an interview, Mr. Schmidt — by turns thoughtful, pedagogical and hubristic — stated he  
26 had embarked on an effort to modernize the U.S. military because it was "stuck in software in the  
27 1980s."

28 He portrayed himself as a successful technologist who didn't consider in retirement and [who](#)

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1 [owed a debt to the country](https://www.nytimes.com/2020/02/27/opinion/eric-schmidt-ai-china.html) ( [https://www.nytimes.com/2020/02/27/opinion/eric-schmidt-ai-](https://www.nytimes.com/2020/02/27/opinion/eric-schmidt-ai-china.html)  
2 china.html ) for his wealth — and who now had time and perception to resolve one of America’s  
3 hardest issues. The purpose, he stated, “should be to have as many software companies to supply  
4 software of many, many different kinds: military, H.R. systems, email systems, things which  
5 involve military intelligence, weapons systems and what have you.”

6 Mr. Schmidt is urgent ahead with a Silicon Valley worldview the place advances in software  
7 program and A.I. are the keys to determining nearly any situation. While that philosophy has led to  
8 [social networks that spread disinformation](https://www.nytimes.com/2018/11/14/technology/facebook-data-russia-election-racism.html) ( <https://www.nytimes.com/2018/11/14/technology/facebook-data-russia-election-racism.html> ) and  
9 different unintended penalties, Mr. Schmidt stated he was convinced that making use of new and  
10 comparatively untested technology to complex conditions — together with lethal ones — would  
11 make service members extra environment friendly and bolster the United States in its competition  
12 with China.

14 His techno-solutionism is difficult by his ties to Google. Though Mr. Schmidt left the  
15 corporate’s board final June and has no official working function, he holds \$5. Three billion in  
16 shares of Google’s parent, Alphabet. He also stays on the payroll as an adviser, incomes a \$1 annual  
17 wage, with two assistants stationed at Google’s Silicon Valley headquarters.

18 That has led to allegations that Mr. Schmidt is placing Google’s financial pursuits forward  
19 of different concerns in his protection work. Late final yr, a federal court ordered a congressional  
20 advisory committee he leads to flip over data that would make clear whether or not Mr. Schmidt  
21 had advocated his business interests whereas heading the group.

22 Mr. Schmidt stated he had adopted guidelines to keep away from conflicts. “Everybody is  
23 rule-bound at the Pentagon, and we are too,” he stated.

24 Google and the Defense Department declined to touch upon Mr. Schmidt’s work.

25 Even without these issues, shifting the military’s path isn’t any easy process. While Mr.  
26 Schmidt has helped generate reports and recommendations about know-how for the Pentagon, [few](https://www.facadatabase.gov/FACA/apex/FACAPublicCommittee?id=a10t0000001gzneAAA)  
27 [have been adopted](https://www.facadatabase.gov/FACA/apex/FACAPublicCommittee?id=a10t0000001gzneAAA). ( [https://www.facadatabase.gov/FACA/apex/FACAPublicCommittee?](https://www.facadatabase.gov/FACA/apex/FACAPublicCommittee?id=a10t0000001gzneAAA)  
28 id=a10t0000001gzneAAA )

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1 “I’m sure he’ll be frustrated,” stated Representative Mac Thornberry, a Republican of Texas  
2 who nominated Mr. Schmidt in 2018 to an advisory committee on A.I. “Unlike the private sector,  
3 you can’t just snap your fingers and make it happen.”

4 Mr. Schmidt acknowledged that progress was sluggish. “I am bizarrely told by my military  
5 friends that they have moved incredibly fast, showing you the difference of time frames between the  
6 world I live in and the world they live in,” he stated.

7 But he stated he had little intention of backing down. “The way to understand the military is  
8 that the soldiers spend a great deal of time looking at screens. And human vision is not as good as  
9 computer vision,” he stated. “It’s insane that you have people going to service academies, and we  
10 spend an enormous amount of training, training these people, and we put them in essentially  
11 monotonous work.”

12 Mr. Schmidt’s first brush with the military got here in 1976, whereas he was in graduate  
13 college on the University of California, Berkeley. There, he centered on research on distributed  
14 computing, funded by cash from Darpa, an analysis arm of the Defense Department.

15 The work catapulted Mr. Schmidt into his technology profession. After finishing his  
16 graduate studies in pc science, he labored at various tech firms for more than twenty years, together  
17 with the networking software maker Novell. In 2001, Google appointed him chief govt.

18 The search engine firm was then in its infancy. Its 20-something founders, Larry Page and  
19 Sergey Brin, were contemporary out of a Stanford University doctorate program and had little  
20 business expertise. Mr. Schmidt was hired to assist information them, offering “adult supervision,”  
21 which he did — after which some.

22 Mr. Schmidt [took Google public in 2004](https://www.nytimes.com/2004/04/30/business/the-google-ipo-wall-street-an-egalitarian-auction-bankers-are-not-amused.html) (  
23 [https://www.nytimes.com/2004/04/30/business/the-google-ipo-wall-street-an-egalitarian-auction-](https://www.nytimes.com/2004/04/30/business/the-google-ipo-wall-street-an-egalitarian-auction-bankers-are-not-amused.html)  
24 [bankers-are-not-amused.html](https://www.nytimes.com/2004/04/30/business/the-google-ipo-wall-street-an-egalitarian-auction-bankers-are-not-amused.html) ) and built it right into a behemoth, diversifying into smartphones,  
25 cloud computing and [self-driving cars](https://www.nytimes.com/2010/10/10/science/10google.html). (  
26 <https://www.nytimes.com/2010/10/10/science/10google.html> ) The success turned him right into  
27 an enterprise movie star. In 2009, he served as a tech adviser to the Obama administration.

28 In 2011, with Google price almost \$400 billion, the corporate introduced Mr. Page was able



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1 to resume the C.E.O. reins. Mr. Schmidt turned govt chairman.

2 In that function, Mr. Schmidt took on new tasks, many of which introduced him to  
3 Washington. In 2012, he participated in categorized briefings on cybersecurity with Pentagon  
4 officers as half of the Enduring Security Framework program. In 2015, he attended a seminar on the  
5 banks of the Potomac River, hosted by then-Defense Secretary Ash Carter, on the use of know-how  
6 inside the government.

7 “It was all interesting to me,” Mr. Schmidt stated. “I didn’t really know much about it.”

8 He additionally traveled to North Korea, Afghanistan and Libya whereas writing a guide  
9 about know-how and diplomacy, and dabbled in politics, lending technical assist to Hillary Clinton  
10 within the run-up to her 2016 presidential marketing campaign.

11 His enterprise capital fund, Innovation Endeavors, was lively too. It invested in start-ups like  
12 Planet Labs, which operates satellites and sells the imagery to protection and intelligence  
13 companies, and Team8, a cybersecurity firm based by former Israeli intelligence members.

14 At the 2016 World Economic Forum in Davos, Switzerland, Mr. Carter requested Mr.  
15 Schmidt to fulfill. He had a proposal: Could Mr. Schmidt lead the Defense Innovation Board, a  
16 civilian advisory group tasked with bringing new technology to the Pentagon?

17 “We were in one of these dumpy hotels, and there he is with his small entourage walking in,  
18 and he basically said to me, ‘This is what I want to do. You’d be the perfect person to be  
19 chairman,’” Mr. Schmidt said.

20 Mr. Schmidt said he turned down the function as a result of he was busy and had no military  
21 background. But Mr. Carter argued that Mr. Schmidt’s tech experience was wanted, because the  
22 U.S. military — which had as soon as been a middle of innovation — was falling behind companies  
23 like Google and Facebook in software and A.I.

24 Mr. Schmidt finally agreed. (Mr. Carter didn’t reply to requests for remark.)

25 As head of the Defense Innovation Board, Mr. Schmidt started touring navy bases, plane  
26 carriers and plutonium strongholds. The journeys, which took Mr. Schmidt to about 100 bases in  
27 locations like Fayetteville, N.C., and Osan, South Korea, have been a definite break from his well-  
28 heeled life in Silicon Valley.

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1 “You want to see these things,” Mr. Schmidt stated. “I received the nuclear missile tour.  
2 Things which are exhausting. I received a tour of [Cheyenne Mountain](https://www.norad.mil/About-NORAD/Cheyenne-Mountain-Air-Force-Station/) (  
3 <https://www.norad.mil/About-NORAD/Cheyenne-Mountain-Air-Force-Station/> ) so I might  
4 perceive what their actuality was.”

5 One of the primary journeys was to Tampa to go to General Thomas, who is named Tony,  
6 the place Mr. Schmidt saw maps and reside video feeds displayed on huge screens. “Eric’s  
7 observation was that a huge part of what the military does is it sits and watches,” stated Josh  
8 Marcuse, the then executive director of the Defense Innovation Board who was on the journey.

9 The visits made tangible what Mr. Carter had told Mr. Schmidt about how the military was  
10 lagging in technology. Mr. Schmidt quickly made ideas to vary that.

11 Some of his concepts have been impractical. Eric Rosenbach, then the chief of workers to  
12 Mr. Carter, recalled Mr. Schmidt as soon as telling him that the Pentagon can be higher off if it  
13 employed nobody however engineers for a year.

14 Others have been helpful. At an Air Force facility in Qatar in 2016, Mr. Schmidt visited  
15 officers who scheduled flight paths for the tankers that refueled planes. They used a white board and  
16 dry-erase markers to set the schedule, taking eight hours to finish the duty.

17 Mr. Schmidt stated he recalled considering, “Really? This is how you run the air war?”  
18 Afterward, he and others on the Defense Department labored with the tech company Pivotal to ship  
19 software to the officers.

20 On one other journey to a navy base in South Korea in 2017, an intelligence analyst  
21 complained to Mr. Schmidt that the software program he used to evaluate surveillance movies from  
22 North Korea was clunky.

23 “Let me guess,” Mr. Schmidt said, according to a Defense Department aide who traveled  
24 with him. “You don’t have the flexibility to change that.”

25 In December 2017, Mr. Schmidt stepped down as Google’s chairman however remained on  
26 the board. He said he was seeking a brand new chapter.

27 “If I stayed as chairman, then next year would have been the same as the previous year, and  
28 I wanted a change of emphasis,” said Mr. Schmidt. “As chairman of Google, what I did is I ran

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1 around and gave speeches, and went to Brussels and all the things that Google still does today. It's  
2 much better to work on these new things for me."

3 Google declined to comment on Mr. Schmidt's departure as chairman.

4 By then, Mr. Schmidt's ties to Google had induced issues in his protection work. In 2016,  
5 Roma Laster, a Defense Department worker, filed a complaint on the company elevating  
6 considerations about Mr. Schmidt and conflicts of curiosity, Mr. Marcuse stated.

7 In the complaint, [earlier reported by ProPublica](https://www.propublica.org/article/how-amazon-and-silicon-valley-seduced-the-pentagon) ( [https://www.propublica.org/article/how-](https://www.propublica.org/article/how-amazon-and-silicon-valley-seduced-the-pentagon)  
8 [amazon-and-silicon-valley-seduced-the-pentagon](https://www.propublica.org/article/how-amazon-and-silicon-valley-seduced-the-pentagon) ), Ms. Laster, who labored with the Defense  
9 Innovation Board, said Mr. Schmidt had requested a service member what cloud computing  
10 providers their unit used and whether or not they had thought-about options. She stated Mr. Schmidt  
11 confronted a battle of interest as a result of he worked for Google, which additionally gives cloud  
12 services.

13 Mr. Marcuse, who now works at Google, said Mr. Schmidt was "scrupulous and diligent" in  
14 avoiding conflicts. Mr. Schmidt said he adopted the principles forbidding conflicts of interest. Ms.  
15 Laster didn't reply to requests for remark.

16 Mr. Schmidt quickly received caught up in one other situation between Google and the  
17 military. Google had signed a contract in 2017 to assist the Pentagon to construct methods to  
18 automatically analyze drone footage to identify particular objects like buildings, vehicles, and  
19 people.

20 Mr. Schmidt was a proponent of the hassle, known as Project Maven. He stated he inspired  
21 the Pentagon to pursue it and testified in Congress in regards to the undertaking's deserves,  
22 however was not concerned within the company's selection of Google.

23 But the [effort blew up](https://www.nytimes.com/2018/05/30/technology/google-project-maven-pentagon.html) ( [https://www.nytimes.com/2018/05/30/technology/google-project-](https://www.nytimes.com/2018/05/30/technology/google-project-maven-pentagon.html)  
24 [maven-pentagon.html](https://www.nytimes.com/2018/05/30/technology/google-project-maven-pentagon.html) ) in 2018 when [Google employees protested](https://www.nytimes.com/2018/04/04/technology/google-letter-ceo-pentagon-project.html) (  
25 <https://www.nytimes.com/2018/04/04/technology/google-letter-ceo-pentagon-project.html> ) and  
26 stated they didn't need their work to result in deadly strikes. More than 3,000 staff signed a letter to  
27 Mr. Pichai, saying the contract would undermine the general public's belief within the firm.

28 It was a black eye for Mr. Schmidt. Military officers, who stated Project Maven was not

1 getting used for deadly missions, condemned Google for abandoning the contract. Google staff  
2 additionally criticized Mr. Schmidt's ties to the Pentagon.

3 "He has very different goals and values than the engineers at his company," stated Jack  
4 Poulson, a Google worker who protested Mr. Schmidt's military work and who has since left the  
5 company.

6 Mr. Schmidt said he sidestepped discussions about Project Maven as a result of of conflict-  
7 of-interest guidelines, however wished he might have weighed in. "I would have certainly had an  
8 opinion," he stated.

9 Last April, Mr. Schmidt [announced](https://twitter.com/ericschmidt/status/1123324575436214272) (  
10 <https://twitter.com/ericschmidt/status/1123324575436214272> ) he deliberate to go away Google's  
11 board. He had helped create an A.I. middle backed by the Pentagon in 2018 and had additionally  
12 turn into co-chair of the National Security Commission on Artificial Intelligence, a brand new group  
13 advising Congress on developing A.I. for defense.

14 A month after leaving Google, Mr. Schmidt invested in Rebellion Defense, a software  
15 program start-up based by former Defense Department staff that analyzes video gathered through  
16 drone. His enterprise agency later put more cash into the company, and Mr. Schmidt joined its  
17 board.

18 The funding led to extra bother. The Electronic Privacy Information Center, a nonprofit  
19 privateness and civil liberties group, sued the A.I. commission last September for failing to show  
20 over data. EPIC said the group was stacked with industry executives like Mr. Schmidt and others  
21 from Microsoft, Amazon and Oracle, who could potentially sway the government in favor of their  
22 companies' interests.

23 Mr. Schmidt was underneath scrutiny as a result of of Rebellion Defense and the way he  
24 might push the government to make use of the start-up's services, EPIC said.

25 "We don't have any public disclosure about what information Eric has provided to the  
26 commission about his business interests," said John Davisson, a legal professional at EPIC.

27 In December, a district court dominated the A.I. fee should disclose the data requested by  
28 EPIC. The fee has launched a whole lot of pages of paperwork, most of which don't contain Mr.

Schmidt or his companies. EPIC stated extra data are set to be launched.

Chris Lynch, the chief executive of Rebellion Defense, said Mr. Schmidt suggested the company solely on hiring and growth. Mr. Schmidt said he didn't advocate for the Defense Department to purchase technology from the start-up.

He has continued plowing forward. In November, he unveiled a \$1 billion dedication by means of Schmidt Futures, the philanthropic agency that he runs along with his spouse, Wendy, to fund education for those who want to work in public service.

**Google's Eric Schmidt's 'open marriage' and his string of ...**

<https://www.dailymail.co.uk/news/article-2371719/Googles-Eric-Schmidts-open-marriage-string-exotic-lovers.html>

**Eric Schmidt**, Google's executive chairman, has embarked on a string of affairs with younger women, including a vivacious TV presenter who dubbed him 'Dr Strangelove', a leggy blonde public ...

**Eric Schmidt may still be married but he's NYC's hottest ...**

<https://pagesix.com/2019/08/03/ex-google-ceo-eric-schmidt-may-still-be-married-but-hes-nycs-hottest-bachelor/>

The hottest bachelor in NYC right now is 64 — and married. But that's not stopping gorgeous women from lining up to date former Google CEO **Eric Schmidt**, who is said to be worth \$13.3 billion ...

**Google's top lawyer allegedly had affairs with multiple ...**

<https://www.theverge.com/2019/8/29/20837232/google-david-drummond-chief-legal-officer-cheating-wife-affair-policies>

Blakely says "blatant womanizing and **philandering**" was commonplace among some Google executives, an allegation which has been reported about Google higher-ups like **Eric Schmidt**, Sergey Brin, and ...

**Google's top lawyer accused of repeated romances with ...**

<https://nypost.com/2019/08/29/googles-top-lawyer-accused-of-repeated-romances-with-underlings/>

Aug 29, 2019Google's top lawyer routinely ignored company rules regarding dalliances with underlings — and pointed to the lecherous ways of top Googler **Eric Schmidt** to justify his **philandering**, an ...

[TomoNews | Google's philandering exec Eric Schmidt cares ...  
us.tomonews.com/google-s-philandering-exec-eric-schmidt-cares-about-his-privacy-not-yours-2923454](https://www.tomonews.com/google-s-philandering-exec-eric-schmidt-cares-about-his-privacy-not-yours-2923454)

Google's **philandering** exec **Eric Schmidt** cares about his privacy, not yours 2013/07/23.  
NSFW Google exec **Eric Schmidt** is a love machine at age 58, which is quite an achievement considering how dorky he looked during what should have been his sexual prime three decades ago. For all you dudes who have trouble with the ladies, **Schmidt** is living ...

[EXCLUSIVE: Google boss Schmidt spending big ... - Page Six  
https://pagesix.com/2013/07/25/exclusive-google-boss-schmidt-spending-big-bucks-on-womanizing/](https://pagesix.com/2013/07/25/exclusive-google-boss-schmidt-spending-big-bucks-on-womanizing/)

**Eric** and Wendy **Schmidt** (Getty)Schmidt has been seeing pianist Chau-Giang Thi Nguyen (pictured here with former fiance Brian Grazer) (Getty)Google boss **Eric Schmidt** is spending millions to keep his ...

[Married billionaire Eric Schmidt's girlfriend says they'll ...  
https://www.dailymail.co.uk/news/article-7319869/Married-billionaire-Eric-Schmidts-girlfriend-says-theyll-kids-using-frozen-embryos.html](https://www.dailymail.co.uk/news/article-7319869/Married-billionaire-Eric-Schmidts-girlfriend-says-theyll-kids-using-frozen-embryos.html)

Married billionaire **Eric Schmidt's** alleged mistress, 32, 'asked the 64-year-old ex-Google CEO to fertilize her frozen eggs, but he declined' - but she still hopes the pair will have FIVE babies ...

[The Many Women of Eric Schmidt's Instagram - Gawker  
valleywag.gawker.com/the-many-women-of-eric-schmidts-instagram-913796517](https://valleywag.gawker.com/the-many-women-of-eric-schmidts-instagram-913796517)

If there's one thing you should know about Google's Director of Open Marriage Engineering, **Eric Schmidt**, it's that he loves to fuck. He's also following a select, interesting assortment of people on Instagram, and by interesting I mean a lot of models and women in swimwear.

[Google's philandering exec Eric Schmidt cares about his ...](#) <https://www.youtube.com/watch?v=72wlCIEZW8s>

Google exec **Eric Schmidt** is a love machine at age 58, which is quite an achievement considering how dorky he looked during what should have been his sexual prime three decades ago. For all you ...

[Former Lover exposes Eric Schmidt - American Intelligence ...](#) <https://aim4truth.org/2019/07/02/former-lover-exposes-eric-schmidt/>

The following is a transcript of an interview with a Google/Facebook/DARPA insider that was conducted with a member of the Anonymous Patriots, a citizen journalist group aligned with the American Intelligence Media. The person interviewed wishes to remain anonymous and for purposes of the interview will be called Jane GOVT. This conversation took place on...

[Google Deletes Videos Accusing It of Election Manipulation from YouTube... Which It Owns \(thefreethoughtproject.com\)](#) ( <https://thefreethoughtproject.com/youtube-removes-video-election-meddling/> )

[With All These Big Tech Revelations,](#) ( <http://archive.fo/PpwKt> )

[GOOGLE EXECS PANIC! Go Into Hiding - Delete Social Media Accounts After James O'Keefe's Latest Exposé](#) ( <https://www.thegatewaypundit.com/2019/06/google-executives-go-into-hiding-and-delete-their-social-media-accounts-after-james-okeefes-latest-expose/> )

[White House Slams Google As Veritas Censorship Controversy Escalates \(bitchute.com\)](#) ( [https://www.bitchute.com/video/MT2yTSet\\_1Y/](https://www.bitchute.com/video/MT2yTSet_1Y/) )

[Google's NSA Again exposed For Unauthorized Collection Of Americans' Phone Records \(zerohedge.com\)](#) ( <https://www.zerohedge.com/news/2019-06-26/nsa-again-exposed-unauthorized-collection-americans-phone-records> )

[What exactly is google's business model besides selling ads no one clicks on and selling people's data to the NSA? \(AskVoat\)](#) ( <https://voat.co/v/AskVoat/3299607> )

[So the "russian hackers" meddling in the election was Google all along. Why isn't this the](#)

[biggest story in America right now? None of the "trusted" news sources have commented on this at all. \(politics\)](https://voat.co/v/politics/3298699) ( <https://voat.co/v/politics/3298699> )

[Google stealthily infuses political agenda into products](https://www.theepochtimes.com/google-stealthily-infuses-political-agenda-into-products-to-prevent-trump-reelection-insiders-documents-say_2976582.html) ( [https://www.theepochtimes.com/google-stealthily-infuses-political-agenda-into-products-to-prevent-trump-reelection-insiders-documents-say\\_2976582.html](https://www.theepochtimes.com/google-stealthily-infuses-political-agenda-into-products-to-prevent-trump-reelection-insiders-documents-say_2976582.html) )

[Google Chrome is Tracking Your Every Move and Storing It, This is How to Stop It](https://thefreethoughtproject.com/google-tracking-location-history/) ( <https://thefreethoughtproject.com/google-tracking-location-history/> )

[Google Chrome Has Become Surveillance Software, It's Time to Switch | \(archive.fo\)](https://archive.fo/Wordc) ( <https://archive.fo/Wordc> )

[2020 Election; Subliminal Google Messages to Alter Outcome ...](https://www.youtube.com/watch?v=LBmByyFkRlo)

 <https://www.youtube.com/watch?v=LBmByyFkRlo>

**Google**, Facebook, Amazon, Microsoft, and Apple: these companies, the big 5, know almost everything about your life. They know what websites you go to, what y...

[MSNBC segment on Hidden and Subliminal Messages Found In ...](#)

[2020 Election; Subliminal Google Messages to Alter Outcome?](#)

 <https://www.zachdrewshow.com/episodes/2020-election-subliminal-google-messages-to-alter-outcome/>

**Google** manipulates your searches for you to be subconsciously swayed — let that sink in. We are dealing with that today. 2020 Election: Who Decides? **Google** meddling with the 2020 election? We will cover it, but also go back in history and explain that this is NOT a new development. Manipulation, deception: It starts often as **subliminal**.

[Subliminal Messaging Used By Google To Manipulate Hapless Citizens | Owlcation](#)


[Sneaky Subliminal Messages Hidden in Google Ads | Mental Floss](#)

 [mentalfloss.com/article/67223/7-sneaky-subliminal-messages-hidden-ads](https://mentalfloss.com/article/67223/7-sneaky-subliminal-messages-hidden-ads)

The FCC fielded the incident, and subsequently condemned such tactics as being "contrary to the public interest"; it's believed to be the first example of **subliminal** advertising on television.



[Google's Dirty Subliminal Messages You'd Never Notice in Everyday Life ...](https://www.cracked.com/photoplasty_386_17-subliminal-messages-youd-never-notice-in-everyday-life/)

 [https://www.cracked.com/photoplasty\\_386\\_17-subliminal-messages-youd-never-notice-in-everyday-life/](https://www.cracked.com/photoplasty_386_17-subliminal-messages-youd-never-notice-in-everyday-life/)

17 **Subliminal Messages** You'd Never Notice in Everyday Life ... Twitter. **Google** Plus. Stumble Upon. ... We asked you to show us your inner-Banksy by adding **subliminal** ...

[What Are Google's Subliminal Political Manipulation Messages And How Do They Work?](#)

Investigator [Haley Kennington](#) points out that *Google v. Oracle* — is the "[copyright case of the century](#)". ( <https://www.natlawreview.com/article/google-v-oracle-will-software-be-free> )

This decade-long dispute will determine whether Google's unauthorized replication of more than 11,000 lines of Oracle's Java was illegal.

When Apple's iPhone hit stores in 2007, Google needed to develop a similar concept to remain competitive. Java, Google thought, would serve as the basis for its own operating system. But rather than license the software outright, the company instead chose to steal the code and ask for forgiveness later.

As demonstrated through the ongoing court case, Google discussed licensing Java in 2005 in emails to Sun Microsystems but then walked away from the negotiations. Google's leadership allegedly [wrote](#), ( <https://www.wired.com/2012/04/android-google-oracle/> ) "If Sun doesn't want to work with us, we have two options: 1) Abandon Plaintiffs work and adopt MSFT CLR VM and C# language, or 2) Do Java anyway and defend Plaintiffs decision, perhaps making enemies along the way." This appears to be indubitable proof that Google was aware that the code was copyrightable.

This shouldn't come as a surprise. A top lawyer for Google once [admitted](#) ( <https://www.sfgate.com/books/article/In-the-Plex-The-Googlization-of-Everything-2375189.php> ) that "Google's leadership doesn't care terribly much about precedent or law." The company seems to think that its high-priced lawyers and endless monetary resources can always rewrite the rules of the road to meet the company's financial interests.

Google's strategy of ostensibly stealing intellectual property appears to rely on the Plaintiffs

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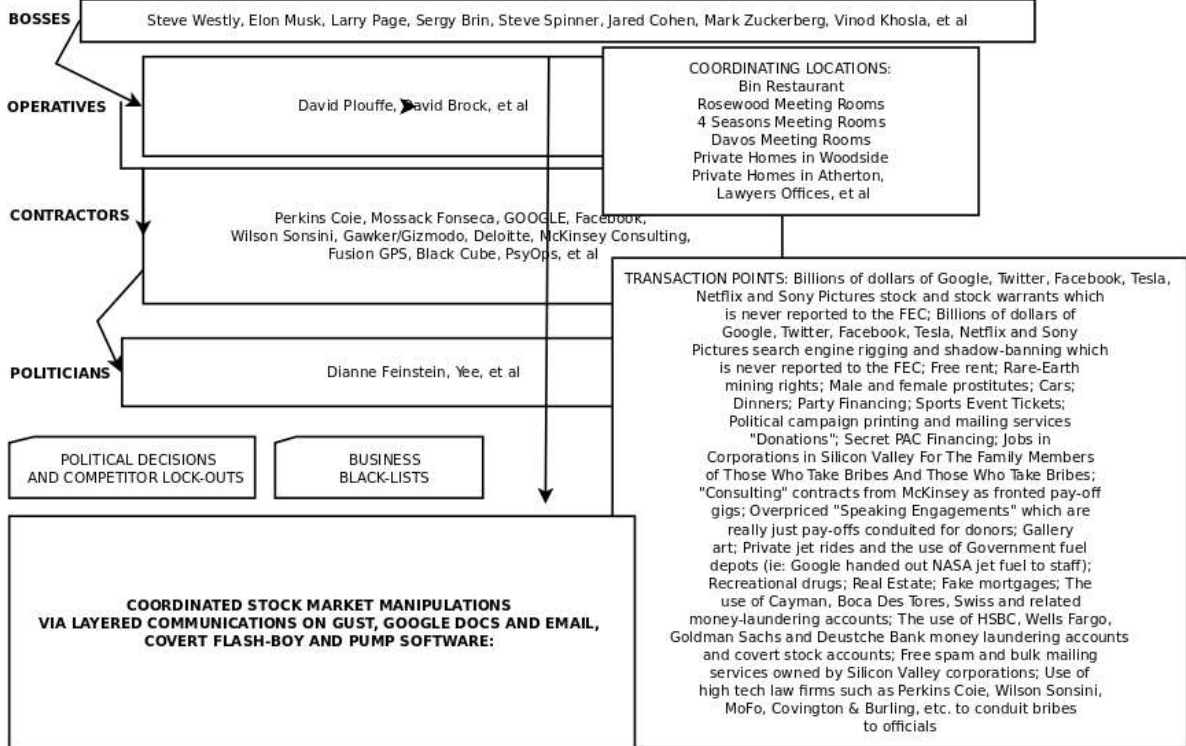
1 inability to withstand the years of costly litigation and legal delay tactics that it brings against its  
2 challengers. This practice has been coined in the I.P. space as "[efficient infringement](https://www.law360.com/articles/1245477)". (  
3 <https://www.law360.com/articles/1245477> ) " Similar claims have been made over the years from  
4 companies such as the speaker company Sonos, the lyric website Genius, and the review  
5 site Yelp!, all of which allege that Google has stolen their content, software, or other technologies.

6 Unfortunately for Google, efficient infringement in the *Google v. Oracle* case was a  
7 nonstarter. Oracle is a much bigger Plaintiffs challenger than the other companies it has faced in  
8 years past, and it had no problem holding firm over the last ten years of Google's legal delay  
9 tactics. Now, after a decade, the case finds itself in the high court's hands.

10 Previously, the U.S. Court of Appeals for the Federal Circuit stated that Google's decision to  
11 move the code directly to another platform without any alterations wasn't "fair use" since it wasn't  
12 transformative and was used just for one company's financial gain. When reviewing the facts and  
13 matters of law in this case, it becomes abundantly clear that it made the right call.

14 In the coming weeks, the Supreme Court should confirm the U.S. Court of Federal Claims'  
15 findings. It should not try to "correct" the software industry for Google, **one of the most predatory**  
16 **companies in modern times**. Deep down, even Google itself likely knows that the coding it lifted is  
17 copyrightable. The company has endless cash and appears to want to use it to carve out I.P.  
18 loopholes for itself. That should not be tolerated — not today, not tomorrow, not ever.

19 Google spied on Plaintiffs, copy their software, business models, blockaded their patents,  
20 ran black-lists that got them sued by the DOJ and still continues to operate like the technology  
21 branch of the Mafia.  
22  
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Pg 612 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH**THE SILICON VALLEY CARTEL****A Recap Of The Musk And Silicon Valley Cartel Assertions**

*THE INVESTIGATIONS OF THE CORRUPTION AT GOOGLE: Google exists to mass manipulate populations and run stock market scams for Google's owners. From INSIDE Google, Plaintiffs team saw Google manipulate the entire internet to hype up Larry Page's "boyfriend": Elon Musk and Tesla, which Google execs owned a portion of, while sabotaging Tesla's competitors.*

*Google illicitly and illegally timed these manipulations with stock market pump-and-dump efforts to exploit insider trading. That is a felony violation of RICO, Antitrust and other laws. Every single thing that Google does is contrived to harm a competitor, a politician, an employee whistleblower or some other business adversary.*

*There are no "bugs", "operator errors", "server anomalies" or other media "accidents" at*

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1 Google. Everything Google does is contrived, at a psychological warfare kind of level, to change a  
2 social perception.

3 Google must show its software to FBI, SEC, FTC and Plaintiffs search engine optimization  
4 experts to prove that they did not engage in these crimes. The fact is: We can prove they did the  
5 crimes and FBI experts can help us prove it! Google is known as the "Nazi's of the Internet". In a  
6 case unfolding in Britain over whether Google wrongly demoted price comparison rival Foundem  
7 from its search results in favour of paid-for adverts, Google must now decide which it values more:  
8 the algorithms that rank its search results, or its stance that manually fiddling with those results to  
9 promote its own paid-for products over rivals' sites doesn't break competition laws.

10 The integrity of Google's ranking processes relies upon all webmasters or website owners  
11 having the same degree of access to information about Google's ranking... This will no longer be  
12 the case if information of this kind is made available to some individuals offering commercial  
13 services to assist companies to improve their Search ranking.

14 Google is a criminal operation. It's executives have been publicly exposed as participants in  
15 horrific sex scandals, money laundering, political bribery and racism. It is time for the bought and  
16 paid shill politicians to stop protecting them! - Google spies on competitors and steals their  
17 technology -

18 Google runs tens of millions of dollars of defamation attacks against competitors - Google  
19 hides all media and news coverage for competitors of Larry Page's boyfriend: Elon Musk - Google  
20 lies to the public about what they really do with the public's data - Google promotes illegal  
21 immigration in order to get cheap labor and control votes - Google runs VC funding back-lists  
22 against start-ups that are competitive - Google bribes thousands of politicians - Google is a  
23 criminal RICO-violating monopoly - Google rigs the stock market with Flash-boy, Pump/Dump and  
24 Microblast SEC violating computer tricks - Google pays bribes to politicians in Google and  
25 YouTube stock - Google manipulates who gets to see what web-sites, globally, for competitor black-  
26 lists - Google has a "no poaching" Silicon Valley jobs blacklist -

27 Google bosses sexually abuse women and young boys - Google bosses run sex trafficking  
28 operations in the Epstein and NXVIUM cults - Google bosses control the NVCA financing cartel

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1 over start-ups - Google has placed the majority of the corporate staff in at least one White House -  
2 Google controls national elections for anti-competitive purposes - The company "Polyhop", in the  
3 HOUSE OF CARDS tv show, does all the crimes that Google actually does in reality - Google's law  
4 firms, like Wilson Sonsini, are corrupt conduits for payola and political conduit-relays - Google  
5 bribes some politicians with revolving door jobs -

6 Google is primarily responsible for destroying the Bay Area Housing opportunities - Google  
7 runs DDoS attacks on competitors by massively crawling their sites - Google boss Andy Rubin runs  
8 a sex slave farm according to his own family - Google boss Eric Schmidt was a philandering sex-  
9 penthouse owner according to vast news articles - Google executives hire so many hookers that one  
10 of them, Mr. Hayes, was killed by his hooker -

11 Google executives sexually abuse so many women that the women staff of Google walked  
12 out one day - In the 2009 White House, you could not swing a cat without hitting a Google insider -  
13 Google has paid covert bribes, PAC funds, real estate and search rigging payola to every CA  
14 Senator - Google has paid bribes, through its lobby fronts, to halt FBI, SEC, FEC and FTC  
15 investigations of Google crimes - Google was funded by the CIA, via In-Q-Tel, a so called "501 c3  
16 charity" which was caught with tons of cocaine -

17 Google gets millions of dollars of taxpayer cash for spying on Americans inside the USA -  
18 Google's map service was a spy system paid for by taxpayers money that Google now profits off of -  
19 Nancy Pelosi and Dianne Feinstein have promised to "protect" Google because their families profit  
20 off Google stocks - Payment receipts prove that Google and Gawker/Gizmodo exchanged cash and  
21 staff for Character Assassination attacks -

22 Google VC's and bosses have spent \$30M+ rigging the U.S. Patent Office to protect Google  
23 and harm Google competitors - Google bribed it's lawyer into position as head of the U.S. Patent  
24 office in order to have her protect Google - To rig insider stock trades, Google hides negative Tesla  
25 stories and pumps positive Tesla stories on "push days" - Google and Elon Musk Co-own, co-invest  
26 and co-market stocks covertly while running anti-trust schemes - Google rarely likes, or hires,  
27 black employees per federal and news media investigations - Google hired most of the Washington,  
28 DC K Street lobby firms and told them to "do what ever they could" - The film: "Miss Sloane"

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1 depicts only 2% of the illicit lobbying tactics Google employs daily -

2        *Demands for an FTC and FBI raid of Google, for criminal activity, securities law and*  
3 *election felonies have been filed - Google's David Drummond had his Woodside, CA Quail Road*  
4 *house bugged revealing sex and financial misdeeds - Google, and it's Cartel (Alphabet, Youtube,*  
5 *and hundreds of other shell-company facades) are a criminal organization engaged in felony-class*  
6 *crimes. Google's bosses bribe politicians, regulators and law enforcement officials to hold off*  
7 *prosecution. At Google: Kent Walker, Andy Rubin, Larry Page, Eric Schmidt, Sergy Brin, Jared*  
8 *Cohen, Yasmin Green, David Drummond and Ian Fette are so enmeshed in sex scandals, election*  
9 *manipulation, and White House bribes that it is hard to comprehend how they can get any*  
10 *legitimate work done.*

11        *Google executives came from most of the fraternity houses involved in the college rape*  
12 *scandals. Google sells covert character assassination services to politicians and fellow oligarchs.*  
13 *Youtube/Google/Alphabet/Deep State are all the same entity. They conspire to hide news about*  
14 *their corruption and they control most of the internet.*  
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**EXHIBIT 23 - Felony Charges Against affiliated insiders Mark Zuckerberg And Cheryl Sandberg**

Defendants and their Cartel operatives engaged in election law violating campaign finance, money laundering, illicit political quid pro quo and anti-trust violating operations, among other crimes.

Because of what the “[THE FACEBOOK FACE-PLANT](#)” matter exposed; citizens are calling their elected officials and demanding that the Department of Defense and The Department Of Justice CUT-OFF **Facebook/WhatsApp/Instagram** from their global DNS servers until they [FULLY answer to Congress for their crimes and lies](#). This Silicon Valley social crime operation has been proven to be a national security risk, a dire threat to our youth, [a bribery operator](#) and a threat to society as a whole! October 4, 2021 was the first day in modern human history that the entire planet was freed from the social stain that is the Facebook empire. University data scientists and forensic internet analysts were able to compare traffic manipulations on Oct 1., 2021, by Facebook's web manipulation and privacy harvesting gang, to the "clean" internet that uniquely existed on Oct. 4, 2021. [You can see the changes. You can see who was controlling what. You can see the fake user data stop...and start. The whole thing is rigged and the scientific facts now prove it!](#)

The Congressional Senate Commerce hearings have further proved that FACEBOOK operates exactly like a ***Mexican drug cartel*** run by '***El Zucko***' pushing addictive media and messaging to kids and vulnerable citizens in order to control global politics. Zuckerberg's “Tech Cartel” owns the U.S. Congress with billions of dollars of bribes and lobbyists. We have warned Congress and the agencies about these issues, in writing, since 2002 but lobbyists seem to speak louder than justice!

The facts prove that Facebook is one of the largest abusers of children in the world.

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1 FACEBOOK makes over one billion dollars, per day, for each day that they delay Congress from  
2 acting! If Osama Bin Laden and Adolph Hitler jointly owned Google and Facebook and Congress  
3 repeatedly called them in for hearings and at the end of each hearing they said "We made some  
4 mistakes but we will do better", would you ever believe them? Would you wonder how Congress  
5 could go for decades without stopping them? If you found Nazi gold bars and underage Afghan  
6 slaves in the closets of the Senators, would that better explain why Congress does nothing about  
7 Facebook And Google?



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EFiled: Aug 06 2021 03:33PM EDT  
Transaction ID 66828179  
Case No. Multi-Case



**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

EMPLOYEES' RETIREMENT SYSTEM OF  
RHODE ISLAND, and CITY OF WARWICK  
RETIREMENT SYSTEM,

Plaintiffs,

v.

MARK ZUCKERBERG, SHERYL SANDBERG,  
MARC ANDREESSEN, PETER THIEL, and  
PALANTIR TECHNOLOGIES INC.,

Defendants,

and

FACEBOOK, INC.,

Nominal Defendant.

C.A. No. 2021-0617-JRS  
(Consolidated into  
C.A. No. 2018-0307-JRS)

**ORIGINAL FILED:**  
July 16, 2021

**PUBLIC VERSION  
FILED:**  
August 6, 2021

**VERIFIED STOCKHOLDER DERIVATIVE COMPLAINT**

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1 'Zuckerberg seems to think our elections are for sale'. Citizens react with fury over  
2 revelations Mark Zuckerberg piled \$400million into local Democratic organizations to help swing  
3 the election for Biden and that he has spent over \$5B manipulating other American elections. Proof  
4 that the elections WERE rigged!

5 Rep. Dan Bishop said that Facebook CEO Mark Zuckerberg 'put a thumb on the scale' in the  
6 2020 election cycle and other elections. Zuckerberg, 37, and his wife Priscilla Chan, 36, gave  
7 \$419.5 million into two nonprofits that largely donated to control elections. CTCL and CEIR  
8 profited grants to counties to help fund the election manipulations as covertly prepared for  
9 Zuckerberg by Obama staffer David Plouffe.

10 The *New York Post*'s front-page package of articles and op-eds did an admirable job of  
11 covering the scandal, bringing much-needed attention to an issue that many Americans knew little  
12 about, even though it was arguably the decisive factor in the 2020 presidential election.

13 The Amistad Project filed [the first litigation](#) seeking to block private funding of elections in  
14 September 2020, based on investigations that began months earlier. We have continued and  
15 expanded our investigate-and-litigate strategy ever since, with a particular focus on the swing states  
16 that ultimately decided the outcome of the election.

17 What we have [uncovered](#) through litigation, discovery, open records requests, and witness  
18 interviews is deeply disturbing. In addition to [over \\$400 million from Zuckerberg](#), The Amistad  
19 Project has identified hundreds of millions of dollars' worth of additional contributions in the form  
20 of talent, information, and monies from leftist individuals and nonprofits. All told, the real total  
21 easily exceeds *\$1 billion*.

22 As numerous reports have correctly pointed out, there were not explicit laws on the books  
23 forbidding the infusion of private monies into public election offices, primarily because such a  
24 scheme had never been attempted or anticipated prior to 2020. There are, however, longstanding  
25 laws that apply to the broader contours of the left's election meddling operation, because efforts to  
26 interfere with free and fair elections to produce a desired outcome are as old as democracy itself.

27 For instance, if it can be proven that leftist organizations gave money to public officials with  
28 the intent of achieving a partisan electoral advantage, then those contributions are a direct violation

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1 of campaign finance law.

2 In addition, conspiracy to deprive “any person or any class of persons of the equal protection  
3 of the laws” is a violation of longstanding civil rights laws. Zuckerberg-funded grants from the  
4 Center for Tech and Civic Life heavily favored Democrat-leaning cities and counties, resulting in  
5 massive discrepancies in per-capita election funding between the urban core of major battleground  
6 states and the rest of those states. The conditions imposed as part of those grants further  
7 disadvantaged voters in less urban areas, for example by making it easier for urban voters to have  
8 flawed ballots “cured” by officials paid with Zuckerberg money. Moreover, as reported by Mollie  
9 Hemingway, these private interests actively worked to eviscerate state election integrity laws  
10 allowing for massive breaches in the chain of custody of the ballots in the urban core.

11 Voters in Zuckerberg-funded jurisdictions also benefited disproportionately from access to  
12 conveniences such as absentee ballot drop boxes – in Delaware County, Pennsylvania, one drop box  
13 was placed every four square miles and for every 4,000 voters; in the 59 counties carried by Trump  
14 in 2016, there was one drop box for every 1,100 square miles and every 72,000 voters.

15 And this disparate impact was the result of a conspiracy.

16 The plan was outlined months in advance by David Plouffe, Barack Obama’s 2008  
17 campaign manager who later served as a senior political advisor to the Chan-Zuckerberg Initiative.  
18 In his book, *A Citizen’s Guide to Beating Donald Trump*, Plouffe predicted that the 2020 general  
19 election would come down to a “block by block street fight” to turn out the vote in the urban core,  
20 especially cities such as Detroit, Milwaukee, and Philadelphia. Not long after that book came out,  
21 Plouffe’s previous employer, the Chan-Zuckerberg Initiative, began pouring staggering amounts of  
22 money – \$350 million – into CTCL, which proceeded to use it to turn out left-leaning voters in  
23 cities such as Detroit, Milwaukee, and Philadelphia.

24 Prior to 2020, CTCL’s annual revenues never exceeded \$1.2 million. But it had all the right  
25 connections – leaders such as Tiana Epps-Johnson and Whitney May, who are veterans of the  
26 George Soros-funded New Organizing Institute. And CTCL represents just one of scores of leftist  
27 nonprofits interfering with the 2020 election.

28 The Amistad Project is still fighting to hold Mark Zuckerberg, CTCL, and the other key

1 players in this conspiracy accountable. In the coming days, for instance, we will be issuing demands  
2 as part of our civil litigation, and will continue consulting those with subpoena power, to demand  
3 the production of communications Zuckerberg and other substantial players and billionaires had  
4 with leftist nonprofits pertaining to the 2020 election.

5 Leftist election officials in the urban core of the swing states kicked America out of the  
6 counting room and invited billionaires in during the 2020 election. Elections must be transparent to  
7 be fair, and America deserves to see the records reflecting how these private interests funded by  
8 left-leaning billionaires managed the election.

9 When those communications are public, it will be clear that the left did far more than just  
10 corrupt our elections – they were actively working to turn government offices, which must act  
11 objectively, into campaign turn-out-the-vote centers for the Biden campaign.

12 [\*The FACEBOOK Papers: Docs reveal internal fury and dissent\*](#)  
13 [\*over site's policies...\*](#)

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15 [\*Damning picture of company's role in insurrection...\*](#)

16  
17 [\*Treasure trove for antitrust war...\*](#)

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19 [\*People or profit? Case against Zuckerberg...\*](#)

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21 [\*31 COORDINATED STORIES...\*](#)  
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**EXHIBIT 24- Felony Charges Against affiliated insiders who are U.S. Senators, White House Executives And Other Public Officials**

The companies charged in this complaint are largely owned by U.S. Senators and their family members, along with major government agency officials.

In other words, the companies charged with doing coordinated crimes and corruption are owned by the very people that are responsible for regulating those companies.

Those public officials have the means, the motive and the novel ability to manipulate funding for those companies and against their competitors.

Forensic data proves that the charged officials have done so.

Analysis of financial disclosure data, FINCEN reports and ICIJ leaks shows senators and their spouses have as much as \$400M invested in corporate stocks.

We have first-hand knowledge of, and experience with, West Coast public officials putting hit-jobs, media attacks, de-funding orders and benefits manipulations on their constituents in order to protect their stock interests.

As they set national policy on important issues such as climate change, tech monopolies, medical debt and income inequality, these US senators have glaring conflicts of interest and have participated in cover-ups of these crimes and attacks on us for reporting them.

While corrupt public officials argue that “it isn’t illegal for them to own stocks” because they made exceptions in the law exclusively for themselves, it IS illegal to use such gains for racketeering!

An analysis of personal financial disclosure data has found that senators and their spouses have as much as \$400M personally invested in corporate stocks.

The majority of these stocks come from public companies that these officials regulate.

Overall, the senators are invested in 338 companies – including tech firms such as Apple and Microsoft, oil and gas giants including ExxonMobil and Antero Midstream, telecom companies

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1 including Verizon, and major defense contractors such as Boeing.

2 The average range of the investments is between \$551,000 and nearly \$1,874,000 while  
3 these Senators also get millions of dollars of other perks from these companies.

4 Not only are the senators far wealthier than most of their constituents, but they're in a prime  
5 position to increase their wealth via policymaking.

6 The lawmakers' motivations are clearly driven by corruption. If a representative on the  
7 House financial services committee [owns hundreds of thousands of dollars worth of stock in Bank](#)  
8 [of America](#), how might this investment affect their questioning of Bank of America's CEO in a  
9 hearing? Could it influence how they legislate and vote on banking issues? Of COURSE IT DOES!

10 Senator Joe Manchin, the ranking member on the Senate energy and natural resources  
11 committee, owns between \$1m and \$5m worth of non-public stock in his family coal business,  
12 Enersystems, making him the only Democratic senator who is directly profiting from the  
13 environmentally devastating coal business.

14 Despite pressure from the left, the Senate minority leader, Chuck Schumer, made Manchin  
15 the ranking member of the committee, and Manchin did not divest his coal holdings.

16 Some senators want to do away with these perceived conflicts of interest. Senator Elizabeth  
17 Warren introduced [anti-corruption legislation](#) in August 2018 that included a ban on members of  
18 Congress, senior congressional staff, cabinet secretaries, White House staff, federal judges and  
19 other officials from owning individual stocks, bonds, commodities, futures and other types of  
20 securities while in office. The senators Sherrod Brown and Jeff Merkley introduced the [Ban](#)  
21 [Conflicted Trading Act](#) in December to prevent members of Congress and senior staff from trading  
22 individual corporate stocks. All such attempts to end stock market bribery have been defeated by  
23 the corrupt senators who make all of their money off of stock bribes.

24 Senators have between \$8.3m and \$22m invested in the communications and electronics  
25 sector, including up to \$4.2m in internet companies and as much as \$4.1m in computer software  
26 businesses. Senator Shelley Moore Capito, a member of the commerce, science, and transportation  
27 committee's subcommittee on communications, technology, innovation and the internet and the  
28 subcommittee on manufacturing, trade and consumer protection, owns between \$53,000 and

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1 \$194,000 worth of Microsoft stock, as much as \$99,000 of Intel stock and up to \$30,000 each in  
2 AT&T and Verizon stock.

3 Senator Jacky Rosen, who is also on both subcommittees, owns between \$310,000 and \$1m  
4 worth of communications and electronics stock. Her largest potential investments are as much as  
5 \$265,000 in Amazon, up to \$115,000 in AT&T and \$100,000 in software company Adobe.

6 Energy and natural resources companies come up frequently in the senators' investments;  
7 members own between \$3.5m and \$13.9m in stocks in this sector. As the world hurtles towards a  
8 potential climate catastrophe by 2030, senators own as much as \$6.1m worth of stock in oil and gas  
9 companies. In addition, members have between \$1.1m and \$2.8m invested in electric and natural  
10 gas utilities stocks.

11 Fifteen senators own stock in Apple and in Microsoft; eleven are invested in Amazon and in  
12 Intel, and 10 own stock in Google's parent company, Alphabet.

13 Aside from the Wireless Telecom Group, in which Senator Rick Scott of Florida has as  
14 much as \$3m invested, the top public stocks by investment amount are Apple (between \$798,000  
15 and \$2.2m), Microsoft (\$588,000 to \$2.2m), and Alphabet (\$577,000 to \$1.8m). Ownership in  
16 Amazon, which is [vying for a \\$10bn defense contract](#), is not far behind at between \$423,000 and  
17 \$1.3m.

18 Wells Fargo, the financial giant that has paid numerous fines for its frequently fraudulent  
19 practices, is the bank that has attracted the most investment dollars from senators: as much as  
20 \$1.5m. Also among the top stocks are telecom companies Crown Castle International (\$385,000 to  
21 \$1.2m), Verizon (\$407,000 to \$1m), and AT&T (\$250,000 to \$925,000).

22 In terms of total stock ownership in the five sectors, Senator Dianne Feinstein, who along  
23 with husband Richard Blum, an investment banker, is second, with up to \$7m invested in the five  
24 sectors. Blum's purchase of as much as \$250,000 worth of Facebook stock three months before his  
25 wife questioned the Facebook CEO, Mark Zuckerberg, came under scrutiny after Sludge [reported](#)  
26 the trade. He has since sold off the stock, but the couple still owns up to \$3.3m worth of  
27 communications and electronics sector stock, which is heavily represented their state of California,  
28 including between \$150,001 and \$650,000 invested in Alphabet.

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1 Feinstein is followed by Senator David Perdue, who owns as much as \$6.4m invested. In  
2 addition to his considerable financial sector stock, the former Dollar General CEO has stock  
3 holdings worth as much as \$2.8m in the energy and natural resources sector and up to \$2m in the  
4 communications and electronics sector.

5 Congress refuses to ban lawmakers from buying and selling individual stocks because it is  
6 the largest conduit for bribes in America.

7 According to a recent NPR report, lawmakers on both sides of the aisle have failed to  
8 disclose stock purchases that they or their spouse made. Disclosure is required under the STOCK  
9 Act.

10 House Speaker Nancy Pelosi's husband has purchased a great deal of tech stock this year.  
11 According to a Forbes report in July, Paul Pelosi made millions on "timely" bets on Big Tech stock  
12 purchases in advance of an antitrust bill stalling in the House. Retail traders are reportedly tracking  
13 Pelosi's trades to decide which to buy.

14 They still sort of continue to blatantly trade in stocks, So in the case of the Pelosis, for  
15 example, she's the Speaker of the House, legislation that's going to affect Big Tech in a positive way  
16 or big contracts going to Big Tech, her husband's not only buying and selling stock in Big Tech, he's  
17 actually buying options, which are sort of leveraged bets that the stock is going to go one way or the  
18 other...and, of course, Paul Pelosi Sr. just happens to be really good at making those predictions  
19 because he tells his wife what to do in Congress so that he can benefit.

20 Looking back to 2011 one can clearly see that lawmakers were making stock purchases in  
21 industries related to committees they were serving on in Congress.

22 Lo and behold, people sitting on the health committee were trading healthcare stocks when  
23 they were introducing legislation that was going to benefit those companies, and vice versa. The  
24 Pelosi material was some of the most explosive back in 2011. She is continuing to do similar sorts  
25 of things today.

26 Pelosi files disclosure forms related to the stock buys that her spouse makes, which is one of  
27 the requirements in the STOCK Act. The website Capitol Trades tracks the stock purchases that  
28 members of Congress make, per their disclosure forms.



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1 There is huge public concern about insider trading in Congress, but further action on the  
2 issue faces roadblocks.

3 The problem remains inherently that we're asking Congress to regulate themselves and this  
4 is a very powerful way for members of Congress to become wealthy. Congress is not really serious  
5 about it, because they don't think it's going to cost their jobs. Insider trading, though, SHOULD put  
6 Congress-people in jail!

7 You need to ban the buying and selling of individual shares of stock. There's no reason  
8 members of Congress should be trading stocks or, specifically, stock options in Tesla, Facebook,  
9 Google, Netflix nd the Silicon Valley Cartel, which are leveraged bets like the Pelosis do.

10 There should be a "searchable database" of the financial disclosure documents from  
11 lawmakers rather than scanned documents.

**EXHIBIT 25 - Related Cases And Dockets Case Numbers**

In the following federal court hearings, cover-ups and information manipulation by powerful oligarchs is clearly shown to be a pattern, a standard process and a manner that affected government agencies including IRS, SSA, HUD, GOVT, etc:

**Case No. 1:20-cv-03010** ( Google monopoly and competitor attacks case)

**Case No. 11-CV-2509** ( <https://www.cand.uscourts.gov/judges/koh-lucy-h-lhk/in-re-high-tech-employee-antitrust-litigation/> )

**Task force Case No. 20-xyz2020a** ( <http://www.case-xyz2020a.com/> )

**Case No. 20-03664** ( <https://www.insurancejournal.com/app/uploads/2020/06/brown-v-google.pdf> )

**Case No. 1:12-CV-00774-mms** and related cases. ( <https://thehill.com/blogs/congress-blog/the-administration/250109-a-case-study-in-pay-to-play-cronyism>. Criminal referrals against the attackers have been filed with the FBI, DOJ, SEC, FEC, FTC )

**Case No. 18-cv-8865** (S.D.N.Y.)(SEC v. Elon Musk for lies and scams )

**Case No. 18-cv-8947** (S.D.N.Y.)( SEC v. Tesla, Inc. for lies and scams )

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**Case No. 1:14-cv-270143** ( Google racketeering charges -

<https://artistrightswatch.com/2017/10/08/googles-racketeering-challenge/> )

**Case No. 1:19-cr-00490** ( United States v. Epstein - Big tech sex cult crimes case )

**Case No. 129 So.3d 1196 (Fla. 2d DCA 2014); 170 So.3d 125 (Fla. 2d DCA 2015)** ( Gawker Media, LLC v. Bollea in which Gawker, Deadspin, Gizmodo, Jalopnik, Jezebel, Kotaku and Lifehacker were exposed as character assassination and money-laundering fronts working for notorious third parties)

**Case No. 19-cv-343672** James Martin (on behalf of ALPHABET INC) v Larry Page et al (Sex Cults In Silicon Valley )

**Case No. CGC-11-508414**, California Superior Court, San Francisco (Plaintiffs v Google )

**Case No. 3:16-cv-03061** U.S. DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA, San Francisco Division ( Plaintiffs V. Google/Alphabet/YouTube)

**Case No. 18-CIV05380** Rubin Vs. Rubin (Google sex cult and sex slave charges )

**Case No. : 1:17 - cv - 06404** Vs. Rubin (Organized crime sex trafficking by stock market manipulators )

**Case No. D.C. No. 3:17-cv-05369** - VC (Big tech harassment of outsiders)

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1 **Case No. 3:21-cv-00077** (Another of many lawsuits proving that the Silicon Valley Cartel  
2 conspires to manipulate media and markets)

3  
4 This, and additional evidence, proves that major public figures had the means and intent to  
5 manipulate Victim/Witnesses's government money and benefits. The massive scope and dollar  
6 amount of the organized crime validates the scale or illegality and the depth of tactics which the  
7 suspects are known to stoop to in order to harm those in their way.

**EXHIBIT 26 -Trillions Of Dollars Of Political Mining Manipulations That Plaintiffs Exposed**

**Afghanistan And The Mines Of Hell That Provided Payola To Senators And Silicon Valley Oligarchs**

How do you pay back the bribes, paid by Silicon Valley tech billionaires, to put Presidents in the White House to be your bitch?

You create payola out of holes in the ground! You use corrupt overseas “rare earth” mineral mines!

Now that the 20 years of war, trillions of dollars of taxpayer expense and American soldier deaths have yielded a not-so-glorious end to the Afghan War, we can all only bide our time until everybody can visit: *Disneyland Kabul*, right?

Mr. nice-guy Taliban boss is one bullet away from being gone and the big beards will control the whole shebang again. They have already started leaking the secrets from the last two decades of conflict.

The U.S. invaded Afghanistan in late 2001. In 2007 Silicon Valley technology oligarchs and the Barack Obama campaign organizers came up with the idea that Afghanistan had trillions of dollars of electric car battery materials in it's dry lake-beds. That covert pretext was used to extend the war. On Aug. 30, 2021, the [U.S. completed a pullout of troops](#) from Afghanistan, providing an uncertain punctuation mark to two decades of conflict.

Of course, by themselves figures can never give a complete picture of what happened and what it means, but they can help put this war in perspective.

**'The Afghanistan Papers' Reveals How Officials Knew The U.S. Was Likely To Fail There**

In April 2002, former President George W. Bush warned that insurgents were trying to undermine any peace and progress the U.S. achieved in Afghanistan.

“We know this from not only intelligence but from the history of military conflict in

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1 Afghanistan. It's been one of initial success followed by long years of floundering and ultimate  
2 failure,” Bush said to the audience at Virginia Military Institute. “We're not going to repeat that  
3 mistake.”

4 Less than 6% of our budget comes from government support. WBUR only exists because  
5 readers like you fund our quality reporting. Donate Now.

6 Yet for all of the positive spin from multiple administrations, there is well-documented  
7 doubt and confusion behind the curtain.

8 In Craig Whitlock’s new book, the author and investigative journalist at The Washington  
9 Post looks at what went wrong in Afghanistan over the two decades the U.S. had troops there.

10  
11 The Post sued the federal government to obtain previously undisclosed documents that  
12 reveal how military leaders, diplomats and other officials publicly praised U.S. progress and success  
13 in Afghanistan while privately knowing that there was no clear strategy or mission. The documents  
14 also suggest they knew the U.S. was probably not able to win.

15 Whitlock outlines these findings in “The Afghanistan Papers: A Secret History of the War.”  
16 He says when the war started after the Sept. 11 terrorist attacks, everyone could identify the enemy  
17 — members of al-Qaida.

18 “That was a pretty successful part of the mission: Within six months, by early 2002, pretty  
19 much all of al-Qaida's leadership had been killed, captured or had fled Afghanistan. At that point,  
20 the enemy was pretty amorphous,” Whitlock says. “That's where things started to go awry.”

21 With al-Qaida largely quelled, the Pentagon — under Secretary of Defense Donald  
22 Rumsfeld’s leadership — was struggling to a “remarkable degree” to clearly define who the enemy  
23 was shortly after the war began, Whitlock says he discovered in the memos obtained for “The  
24 Afghanistan Papers.”

25 Rumsfeld, Bush and former Vice President Dick Cheney would lump together al-Qaida, the  
26 Taliban and other insurgent groups, Whitlock says, often calling them “the bad guys.”

27 “For instance, Rumsfeld wrote a memo to his intelligence chiefs a year or two into the war  
28 in which he said, ‘I have no visibility into who the bad guys are in Afghanistan,’ ” Whitlock says.

1 “And frankly, that wasn't something we ever sorted out over the last two decades.”

2 **On Foreign Service Officer Todd Greentree stating in an oral interview that the U.S.**  
3 **provoked the Taliban insurgency in Afghanistan by hunting them down:**

4 “Greentree goes on in his oral history interview to say that we sort of violated the Afghan  
5 way of war, that over the centuries Afghanistan has been overrun by foreign occupiers. They've also  
6 had civil wars. We have commanders from different parts of the country fighting each other, but  
7 they know how to switch sides and change allegiances. And so that's the way you sort of end the  
8 conflict in Afghanistan, is you have some kind of reconciliation.

9 “But the United States didn't do that. It thought it had defeated the Taliban back in 2002.  
10 And rather than allow for some sort of reconciliation for a way to politically end the fighting, we  
11 kept creating this bigger and bigger list of bad guys, which in turn just made the list get longer and  
12 longer.”

13 **On uncovering an interview with Lt. Gen. Michael Flynn, who told U.S. war auditors**  
14 **in 2015 that:** “if we're doing such a great job, why does it feel like we're losing?” “Well, Flynn was  
15 head of military intelligence for NATO and the United States in Afghanistan. He served many tours  
16 there. And before he got involved in politics and became known as a political extremist, he was well  
17 respected in the military for his intelligence assessments. And his point here is that because we kept  
18 sending in new units every year, troops would rotate in for nine or 12 months at a time. Same with  
19 diplomats at the U.S. Embassy.

20 “He's really getting to the question of human nature here that, particularly in the military,  
21 nobody wants to admit they didn't accomplish the mission, and part of that is the can-do spirit of the  
22 military. But it's also this unwillingness to admit that the situation was unfixable or that you failed.  
23 You don't want to take responsibility for failure on your watch or even to question the mission. The  
24 instinct is always to say you succeeded.”

25 **On how the apparent problems with the U.S. partnership with the local Afghan army**  
26 **doesn't square with public messaging of a strong alliance:**

27 “The slogan that the Pentagon put out was that we're shoulder to shoulder with the Afghans  
28 in the field. We're training them, we're mentoring them, we're patrolling with them. But the reality

1 on the ground was that, as Secretary [Robert] Gates points out [in an interview obtained in 'The  
2 Afghanistan Papers'], we sort of dictated the terms of what they were supposed to do and expected  
3 the Afghans to follow along. Now, part of that was hubris on the part of U.S. officials that we  
4 thought we knew best, even though we really didn't understand Afghanistan that well.

5 "But underlying all that was a sort of distrust of our Afghan partners. You see that in a lot of  
6 oral history interviews with U.S. troops who are serving as trainers or mentors. They just didn't  
7 think the Afghans were up to the job. The Afghan army recruits couldn't read. They couldn't shoot  
8 straight. They deserted often. And so this is a very, very difficult task to train an Afghan army that  
9 was competent. And frankly, the Americans at the field level didn't have much confidence that this  
10 was going to work. But in public, the American generals kept reassuring the public that everything  
11 was going great. So there's this extreme disconnect between what the American people were being  
12 told and what military officials thought behind the scenes."

13 **On Foreign Service Officer Michael Metrinko's comments during an oral interview**  
14 **that CIA officials on the ground in Afghanistan did not understand the country:**

15 "The fact is, we didn't understand the place very well at all. Michael Metrinko is a foreign  
16 service officer who is a rare bird because he spoke Dari, one of the Afghan national languages, and  
17 he was pretty scathing in his assessment of anybody else in The U.S. Government , but particularly  
18 the CIA.

19 "And as he pointed out, the CIA sort of thought they understood Afghanistan and would  
20 come in beards and dress like the locals and hand out bags of cash to warlords to try and get them  
21 on their side. But Metrinko said whenever he would talk with Afghan elders in their native  
22 language, they would sort of laugh at how blind the Americans were in their understanding of  
23 Afghanistan.

24  
25 "Again, this is something we see throughout the war. There was an interview we obtained  
26 with [Lt. Gen.] Douglas Lute, who is the war czar for both Bush and [former President Barack]  
27 Obama, and he said we didn't have the foggiest idea of what we were doing. We were devoid of a  
28 fundamental understanding of Afghanistan. And that's something you hear again and again that



1 even though we were there for 20 years, we never really understood the place. And this was just an  
2 enormous reason why the war failed.”

3 **Book Excerpt: 'The Afghanistan Papers', By Craig Whitlock**

4 Two weeks after the 9/11 attacks, as the United States girded for war in Afghanistan, a  
5 reporter asked Defense Secretary Donald Rumsfeld a straightforward question: Would U.S. officials  
6 lie to the news media about military operations in order to mislead the enemy?

7 Rumsfeld stood at the podium in the Pentagon briefing room. The building still smelled of  
8 smoke and jet fuel from when American Airlines flight 77 exploded into the west wall, killing 189  
9 people. The defense secretary started to reply by paraphrasing a quotation from British Prime  
10 Minister Winston Churchill: “In wartime, truth is so precious that she should always be attended by  
11 a bodyguard of lies.” Rumsfeld explained how the Allies, prior to D-Day, ran a disinformation  
12 campaign called Operation Bodyguard to confuse the Germans about when and where the invasion  
13 of western Europe would take place in 1944.

14 Rumsfeld sounded as if he were justifying the practice of spreading lies during wartime, but  
15 then he pivoted and insisted he would never do such a thing. “The answer to your question is, no, I  
16 cannot imagine a situation,” he said. “I don’t recall that I’ve ever lied to the press. I don’t intend to,  
17 and it seems to me that there will not be reason for it. There are dozens of ways to avoid having to  
18 put yourself in a position where you’re lying. And I don’t do it.”

19 Asked if the same could be expected of everyone else in the Defense Department, Rumsfeld  
20 paused and gave a little smile.

21 “You’ve got to be kidding,” he said.

22 The Pentagon press corps laughed. It was classic Rumsfeld: clever, forceful, unscripted,  
23 disarming. A former star wrestler at Princeton, he was a master at not getting pinned down.

24 Twelve days later, on October 7, 2001, when the U.S. military began bombing Afghanistan,  
25 no one foresaw that it would turn into the most protracted war in American history—longer than  
26 World War I, World War II and Vietnam combined.

27 Unlike the war in Vietnam, or the one that would erupt in Iraq in 2003, the decision to take  
28 military action against Afghanistan was grounded in near-unanimous public support. Shaken and

1 angered by al-Qaeda's devastating terrorist strikes, Americans expected their leaders to defend the  
2 homeland with the same resolve as they did after the Japanese attack on Pearl Harbor. Within three  
3 days of 9/11, Congress passed legislation authorizing the Bush administration to go to war against  
4 al-Qaeda and any country that harbored the network.

5 For the first time, the North Atlantic Treaty Organization (NATO) invoked Article 5, the  
6 alliance's collective commitment to defend any of its member states under attack. The United  
7 Nations Security Council unanimously condemned the "horrifying terrorist attacks" and called on  
8 all countries to bring the perpetrators to justice. Even hostile powers expressed solidarity with the  
9 United States. In Iran, thousands attended candlelight vigils and hardliners stopped shouting "Death  
10 to America" at weekly prayers for the first time in twenty-two years.

11 With such strong backing, U.S. officials had no need to lie or spin to justify the war. Yet  
12 leaders at the White House, the Pentagon and the State Department soon began to make false  
13 assurances and to paper over setbacks on the battlefield. As months and years passed, the  
14 dissembling became more entrenched. Military commanders and diplomats found it harder to  
15 acknowledge mistakes and deliver clear-eyed, honest assessments in public.

16 No one wanted to admit that the war that started as a just cause had deteriorated into a losing  
17 one. From Washington to Kabul, an unspoken conspiracy to mask the truth took hold. Omissions  
18 inexorably led to deceptions and eventually to outright absurdities. Twice—in 2003 and again in  
19 2014—The U.S. Government declared an end to combat operations, episodes of wishful thinking  
20 that had no connection to reality on the ground.

21 Excerpted from THE AFGHANISTAN PAPERS: A Secret History of the War by Craig  
22 Whitlock. Copyright © 2021. Available from Simon & Schuster. Julia Corcoran produced and  
23 edited this interview for broadcast with Tinku Ray. Serena McMahon adapted it for the web.

#### 24 **From 2001 to 2021**

25 On Sept. 18, 2001, the U.S. House of Representatives voted [420-1](#) and the Senate [98-0](#) to  
26 [authorize](#) the United States to go to war, not just in Afghanistan, but in an open-ended commitment  
27 against "those responsible for the recent attacks launched against the United States." U.S. Rep.  
28 Barbara Lee of California cast the [only vote opposed](#) to the war.

1 In other words, the U.S. Congress took [7 days](#) after the 9/11 attacks to deliberate on and  
2 authorize the war.

3 At [7,262 days](#) from the first attack on Afghanistan to the final troop pullout, Afghanistan is  
4 said to be the U.S.'s longest war. But it isn't – the U.S. has [not officially ended the Korean War](#).  
5 And U.S. operations in Vietnam, which began in the mid-1950s and included the declared war from  
6 1965-1975, also rival Afghanistan in longevity.

7 U.S. President [George W. Bush told](#) members of Congress in a joint session on Sept. 20,  
8 2001 that the war would be global, overt, covert and could last a very long time.

9 “Our war on terror begins with al-Qaida, but it does not end there. It will not end until every  
10 terrorist group of global reach has been found, stopped and defeated. ... Americans should not  
11 expect one battle, but a lengthy campaign, unlike any other we have ever seen,” [he said](#).

12 The U.S. started bombing Afghanistan a few weeks later. The Taliban surrendered in  
13 Kandahar on Dec. 9, 2001. The U.S. began to fight them again in earnest in March 2002. In April  
14 2002, President Bush promised to help bring “[true peace](#)” to Afghanistan: “Peace will be achieved  
15 by helping Afghanistan develop its own stable government. Peace will be achieved by helping  
16 Afghanistan train and develop its own national army. And peace will be achieved through an  
17 education system for boys and girls which works.”

18 The global war on terror was not confined to operations in Iraq and Afghanistan. The U.S.  
19 now has counterterrorism operations in [85 countries](#).

### 20 **The human cost**

21 Most Afghans alive today were not born when the U.S. war began. The median age in  
22 Afghanistan is just [18.4 years old](#). Including their country's war with the Soviet Union from 1979  
23 to 1989 and civil war in the 1990s, most Afghans have lived under nearly continuous war.

24 There are, according to the U.S. Bureau of Labor Statistics, [980,000 U.S. Afghanistan war](#)  
25 [veterans](#). Of these men and women, [507,000 served in both Afghanistan and Iraq](#).

26 As of mid-August 2021, [20,722](#) members of the U.S. military had been wounded in action in  
27 Afghanistan, not including the [18 who were injured](#) in the attack by ISIS-K outside the airport in  
28 Kabul on Aug. 26, 2021.

1 Of the veterans who were injured and lost a limb in the post-9/11 wars, many lost [more than](#)  
2 [one](#). According to [Dr. Paul Pasquina](#) of the Uniformed Services University of the Health Sciences,  
3 of these veterans, “About 40% to 60% also sustained a brain injury. Because of some of the lessons  
4 learned and the innovations that have taken place on the battlefield ... we were taking care of  
5 service members who in previous conflicts would have died.”

6 In fact, because of advances in trauma care, more than [90%](#) of all soldiers in Afghanistan  
7 and Iraq who were injured in the field survived. Many of the seriously injured [survived wounds](#) that  
8 in the past might have killed them.

9 In all, [2,455 U.S. service members](#) were killed in the Afghanistan War. The figure includes  
10 13 U.S. troops who were killed by ISIS-K in the Kabul airport attack on Aug. 26, 2021.

11  
12 A burial for one of 2,455 U.S. troops who died in Afghanistan. Olivier Douliery/AFP via  
13 Getty Images

14 U.S. deaths in Operation Enduring Freedom also include 130 service members who died in  
15 other locations besides Afghanistan, including Guantanamo Bay in Cuba, Djibouti, Eritrea,  
16 Ethiopia, Jordan, Kenya, Kyrgyzstan, Pakistan, Philippines, Seychelles, Sudan, Tajikistan, Turkey,  
17 Uzbekistan and Yemen.

18 The U.S. has paid [US\\$100,000 in a “death gratuity”](#) to the survivors of each of the service  
19 members killed in the Afghanistan war, totaling [\\$245.5 billion](#).

20 **More than [46,000 civilians have been killed](#)** by all sides in the Afghanistan conflict. These  
21 are the direct deaths from bombs, bullets, blasts and fire. [Thousands more have been injured](#),  
22 according to the United Nations Assistance Mission in Afghanistan.

23 And while the number of Afghans leaving the country has increased in [recent weeks](#), more  
24 than [2.2 million displaced Afghans](#) were living in Iran and Pakistan at the end of 2020. The United  
25 Nations Refugee Agency reported in late August 2021 that since the start of that year, [more than](#)  
26 [558,000](#) people have been internally displaced, having fled their homes to escape violence.

27 According to the [United Nations](#), in 2021 about a third of people remaining in Afghanistan  
28 are malnourished. [About half of all children under 5 years old](#) experience malnutrition.

1 The human toll also includes the hundreds of Pakistani civilians who were killed in [more](#)  
2 [than 400 U.S. drone strikes](#) since 2004. Those strikes happened as the U.S. sought to kill Taliban  
3 and al-Qaida leaders who fled and sheltered there in late 2001 after the U.S. invasion of  
4 Afghanistan. Pakistani civilians have also been killed in crossfire during fighting between militants  
5 and the Pakistani military.

#### 6 **The financial cost**

7 In terms of the federal budget, Congress has allocated a bit over **\$1 trillion** to the  
8 Department of Defense for the Afghanistan War. But all told, the Afghanistan War has cost much  
9 more than that. Including the Department of Defense spending, more than [\\$2.3 trillion](#) has been  
10 spent so far, including increases to the Pentagon's base military budget due to the fighting, State  
11 Department spending to reconstruct and democratize Afghanistan and train its military, interest on  
12 borrowing to pay for the war, and spending for veterans in the Veteran Affairs system.

13 The total costs so far for all post-9/11 war veterans' disability and medical care costs are  
14 about **\$465 billion** through fiscal 2022. And this doesn't include the future costs of all the post-9/11  
15 veterans' medical and disability care, which [Harvard University scholar Linda Bilmes estimates](#) will  
16 likely add about \$2 trillion to the overall cost of care for veterans of the Iraq and Afghanistan wars  
17 between now and 2050.

18 The war in Afghanistan, like many other wars before it, began with optimistic assessments  
19 of a quick victory and the promise to rebuild at war's end. Despite Bush's warning of a lengthy  
20 campaign, few thought then that would mean decades. But 20 years later, the U.S is still counting  
21 the costs.

22 Meet the "*Russian Treasure Maps*" of Afghanistan. They were said to show where five  
23 trillion dollars worth of copper, *lithium for Tesla*, *indium for Solyndra* and other technology  
24 minerals were hidden in the Afghan plains. That lithium and indium could power Elon Musk's cars  
25 and Solyndra tubes, (if only a certain group of Silicon Valley billionaires had a way to monopolize  
26 that...hmmmm?) But; were those "Treasure Maps" a trick or a treat?

27 To this day, controversy exists across the intelligence communities, of many nations, about  
28 whether, or not, those maps were a scam created to "trick the American's" or the actual locations of

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1 trillions of dollars of mining deals that were “*antibody's for the taking*”. The papers that the CIA  
2 geologists pulled out of that archival library in Kabul, Afghanistan still read to be a bit too  
3 convenient for what happened next. CIA Boss Woolsey promoted lithium batteries until he was blue  
4 in the face. Did Woolsey own mining interests in the CIA manipulation efforts in Afghanistan?  
5 Secretary of Energy Steven Chu, after getting booted out of office for corruption, went to work at a  
6 lithium company. The USAID, staffed by Hillary Clinton associates, pushed white papers and  
7 power-points to tech VC’s pitching the “***trillions of dollars of electric car lithium in Afghanistan***”  
8 and ignoring the fact that it may not even exist and that everybody around it wants to kill you. Is  
9 Elon Musk responsible for the deaths of all of the American soldiers that went to Afghanistan to get  
10 him lithium for his expensive douche-bag cars? Maybe.

11       Decades later, after an invasion or two, and vast expenditures of cash, political capitol and  
12 lives, very little of the promised golden mining treasure has materialized. What has materialized is  
13 epic corruption, political payola, campaign secrets, deaths and controversy. By Pentagon audits,  
14 over SEVEN TRILLION dollars of U.S. taxpayer money disappeared down the hole in Afghanistan  
15 and the U.S. got nothing out of it.

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**Afghanistan: The Saudi Arabia of Lithium?**

**Lithium, which is from mobile phone nation's economy.**

By JAMES RISEN  
Published: June 13, 2010

WASHINGTON — The United States has discovered nearly \$1 trillion in untapped mineral deposits in Afghanistan, far beyond any previously known reserves and enough to fundamentally alter the

As of late February, held Ener1 Group. loan to Think Global, which is trying to emerge from bankruptcy — is held by Bzinfin, a British Virgin Islands company whose "indirect beneficial owner" is Boris Zingarevich, a Russian businessman. Zingarevich has close ties to Russian President Dmitry Medvedev and Prime Minister Vladimir Putin.

**Investing in Lithium Mining Stocks**

**Green power corrupts**

How To Profit from the Lithium Boom

By Brian Hicks  
Friday, October 16th, 2009

Editor's Note:  
While Western Lithium remains trades — and possibly a third — opportunity to double if not trip

**Goldman Sachs culture 'toxic'? Letter confirms suspicions about Wall Street.**

A123 lithium-ion battery maker bankruptcy fuels criticism of President Barack Obama's alternative

Energy & Genius  
**The Saudi Arabia of Lithium**  
Brendan I. Koerner, 10.30.08, 06:00 PM EST  
Forbes Magazine dated November 24, 2008

The gas engine made petroleum the world's biggest commodity. The electric car could do the same for the third element on the

**Ener1 Wants to Win Lithium Ion Battery Race**

Share Tweet Stumble

**U.S. Identifies Vast Mineral Riches in Afghanistan**

**RUSSIAN OWNED**

**The problem with lithium**  
David Booth, National Post

chloride ring SQM creating the illusive the ultra-arid sala

Image: CarSpace

Goldman Sachs discloses ownership in Talison Lithium Corp.

Talison Lithium Ltd's

Lithium ion battery manufacturer Ener1 (HEV) could become the country's first lithium ion battery mass producer—if it wins a \$480M Department of Energy loan. [CNNMoney](#) has more:

Goldman Sachs, McKinsey Consulting and Deloitte helped a few rogue CIA buddies distribute a huge number of white papers and press releases which used the buzz words: "Trillions of dollars of lithium in Afghanistan" and "Afghanistan is the Saudi Arabia of Lithium". Why would those particular companies put so much effort into hyping a pile of dirt on the other side of the planet? The answer lies in who they hyped it to and who took the bait. It turns out, most of the money that flowed through this (probable) scam financed the Obama campaign. It also turns out that those who skimmed profits from this vast flowing river of corruption sludge were Elon Musk,

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1 John Doerr, Eric Schmidt, Steve Jurvetson and the very pack of investors who co-funded the Obama  
2 campaign. They were also the very same people who, exclusively, got the only cash from the  
3 Obama Administration.  
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3 They are also the very same people who had partnered with the Russian mining companies  
4 who were standing by to go back into Afghanistan to dig up this magical dirt-pile. Where “covert  
5 mining deals” were never a big election deal, in 2016, thanks to some monumental document leaks,  
6 they became one of the biggest deals in U.S. history..and not in a good way.

7 In other mining scam news, the **Uranium One controversy** involves the sale of [Uranium](#)  
8 [One](#)  
9 ( [https://en.wikipedia.org/wiki/Uranium\\_One](https://en.wikipedia.org/wiki/Uranium_One) ) to [Rosatom](#)  
10 ( <https://en.wikipedia.org/wiki/Rosatom> ) as a \$145 million bribery scandal involving [Hillary](#)  
11 [Clinton](#) ( [https://en.wikipedia.org/wiki/Hillary\\_Clinton](https://en.wikipedia.org/wiki/Hillary_Clinton) ) and the [Clinton Foundation](#)  
12 ( [https://en.wikipedia.org/wiki/Clinton\\_Foundation](https://en.wikipedia.org/wiki/Clinton_Foundation) ).

13 Since the 2015 publication of the book [Clinton Cash](#)  
14 ( [https://en.wikipedia.org/wiki/Clinton\\_Cash](https://en.wikipedia.org/wiki/Clinton_Cash) ) by [Breitbart News](#)  
15 ( [https://en.wikipedia.org/wiki/Breitbart\\_News](https://en.wikipedia.org/wiki/Breitbart_News) ) editor and [Steve Bannon](#)  
16 ( [https://en.wikipedia.org/wiki/Steve\\_Bannon](https://en.wikipedia.org/wiki/Steve_Bannon) ) collaborator [Peter Schweizer](#)  
17 ( [https://en.wikipedia.org/wiki/Peter\\_Schweizer](https://en.wikipedia.org/wiki/Peter_Schweizer) ), as well as a 2015 *New York Times* article that  
18 Schweizer was involved with,[1]  
19 ( [https://en.wikipedia.org/wiki/Uranium\\_One\\_controversy#cite\\_note-1](https://en.wikipedia.org/wiki/Uranium_One_controversy#cite_note-1) ) allegations of a bribery  
20 scheme involving Hillary Clinton, the Clinton Foundation and the 2010 sale of Uranium One  
21 persisted. [Sean Hannity](#)  
22 ( [https://en.wikipedia.org/wiki/Sean\\_Hannity](https://en.wikipedia.org/wiki/Sean_Hannity) ) characterized it as "the biggest scandal — or, at  
23 least, one of them — in American history," while his frequent guest and former Trump advisor [Seb](#)  
24 [Gorka](#)  
25 ( [https://en.wikipedia.org/wiki/Seb\\_Gorka](https://en.wikipedia.org/wiki/Seb_Gorka) ) equated it with treason worthy of a death sentence.[2]  
26  
27 ( [https://en.wikipedia.org/wiki/Uranium\\_One\\_controversy#cite\\_note-2](https://en.wikipedia.org/wiki/Uranium_One_controversy#cite_note-2) ) On June 29, 2010,  
28 [Renaissance Capital](#), a Russian investment bank with ties to the [Kremlin](#) and which was promoting

Uranium One stock, paid Bill Clinton \$500,000 for a speech in Moscow shortly after the Rosatom acquisition of Uranium One was announced.<sup>[20][21]</sup>

( [https://en.wikipedia.org/wiki/Uranium\\_One\\_controversy#cite\\_note-nyt042315-20](https://en.wikipedia.org/wiki/Uranium_One_controversy#cite_note-nyt042315-20) )

( [https://en.wikipedia.org/wiki/Uranium\\_One\\_controversy#cite\\_note-yf042315-21](https://en.wikipedia.org/wiki/Uranium_One_controversy#cite_note-yf042315-21) )

The Clinton-Uranium One story is the "real" Russian scandal according to experts. [Frank Giustra](#)

( [https://en.wikipedia.org/wiki/Frank\\_Giustra](https://en.wikipedia.org/wiki/Frank_Giustra) ) donated \$31.3 million to the Clinton Foundation, to be followed in 2007 with a pledge of at least \$100 million. These amounts constituted the bulk of the \$145 million in supposed bribes paid to the Clinton Foundation.<sup>[8][9][10]</sup>

( [https://en.wikipedia.org/wiki/Uranium\\_One\\_controversy#cite\\_note-8](https://en.wikipedia.org/wiki/Uranium_One_controversy#cite_note-8) )

( [https://en.wikipedia.org/wiki/Uranium\\_One\\_controversy#cite\\_note-9](https://en.wikipedia.org/wiki/Uranium_One_controversy#cite_note-9) )

( [https://en.wikipedia.org/wiki/Uranium\\_One\\_controversy#cite\\_note-10](https://en.wikipedia.org/wiki/Uranium_One_controversy#cite_note-10) )

In the Congo, Elon Musk's rush to gather Cobalt for his exploding batteries has led to child slave labor, mass rape, genocide and machete mutilations.

The wars and political dirty tricks to gather the politically targeted rare earth mining payola which Google, Tesla, Facebook, Amazon (All sponsors and beneficiaries of the Obama campaigns) stuffed into their products were worth a supposed "\$18 trillion dollars" to the tech oligarchs. People kill other people and rig elections for that kind of money.

GOVT "Tesla Fan Boys" made up their own interpretations of Department of Energy applicants statements and re-wrote applicants intentions in order to create negative data for competitors of Tesla and make Tesla look better even though Tesla was: 1.) about to go bankrupt, 2.) bleeding cash, 3.) owner of the absolute worse debt ratio of any applicant, 4.) Trying to build new buildings, like Solyndra (for real estate holdings to benefit CBRE, Feinstein's husband's company), 5.) bleeding staff, 6.) operated by a sociopath drug abuser, 7.) reliant on Afghanistan war-based lithium battery mines that may never materialize, 8.) reliant on Congo cobalt mines that used child slave labor, 9.) reliant on Panasonic lithium batteries that were never intended for auto energy storage and widely documented to explode and release poison cancer-causing gas during fires, 10.) off budget PER CAR by over \$100,000.00 PER CAR, 11.) in a legal dispute with all of

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1 it's founders, 12.) fully conflicted with stock ownership by GOVT, White House and Senate  
2 executives, and much, much more...

3       The *Lithium, Indium, Cobalt* and *Uranium* mining deals, and their associated wars, were  
4 staged by the Obama Administration, through Goldman Sachs and JP Morgan for the nearly  
5 exclusive benefit of the Silicon Valley Obama political financiers. Obama's utter disaster of a war  
6 in Afghanistan was staged to help Elon Musk buy private jets and hang out at Jeffrey Epstein and  
7 Steve Jurvetson sex parties. How many child slaves died in holes in the ground digging for Musk's  
8 cobalt by hand? The "S" in "Model S" really stands for ***Slave-labor!***

9       Modern civilization was built on fossil fuels, with the invention and commercialization of  
10 the internal combustion engine during the 1800s setting the stage for petroleum-based vehicles to be  
11 dominant worldwide for the next 150 years.

12       Various oil majors continue to produce huge volumes of oil and natural gas, owing to fossil  
13 fuels still being used to meet the bulk of the world's energy requirements.

14       Although energy demand is expected to continue to increase, the share of fossil fuels in the  
15 global energy mix is set to decline. This shift is particularly profound when considering the current  
16 technological revolution in the transportation industry.

17       Increasing concern over the environmental degradation caused by excessive fossil fuel  
18 extraction and burning has led to the development of alternative technologies, disrupting the  
19 monopoly once held by petroleum-powered vehicles.

20       Electric vehicles (EVs) are the front-runners for the future of sustainable transportation.  
21 They use electric motors, which have improved significantly in terms of technology and economies  
22 of scale over the past decade. These battery-powered vehicles seem to be winning the technology  
23 race for the future of transportation.

24       Although many EV variations still present concerns over efficiency, battery range and  
25 safety, it is generally agreed that petroleum- powered vehicles have lost their stranglehold on the  
26 automotive industry, with various experts expecting a dramatic shift to EVs as the dominant vehicle  
27 type within the next decade – particularly in developed countries such as the US and European  
28 countries.

1 Such a shift has been confirmed by US President Joe Biden, who signed Executive Order  
2 14017 on February 24, 2021, to direct a complete government approach to assessing vulnerabilities  
3 in critical supply chains and strengthening their resilience.

4 On June 8, after conducting a 100-day assessment of supply chain vulnerabilities, the White  
5 House issued a statement declaring that EV supply chains – specifically those for the manufacture  
6 of large-capacity EV batteries – are among the most vulnerable and most critical to the economic  
7 future of the US.

8 The statement declared that the US Department of Energy Loan Programs Office (LPO)  
9 would immediately leverage about \$17-billion in loan authority in the Advanced Technology  
10 Vehicles Manufacturing (ATVM) Loan Program to support a domestic battery supply chain.

11 The LPO will leverage full statutory authority to finance key strategic areas of development  
12 and fill capacity deficits in the domestic supply chain. This will include the ATVM program  
13 extending loans to manufacturers of advanced-technology vehicle battery cells and packs for re-  
14 equipping, expanding or establishing such manufacturing facilities in the US.

15 The US Department of the Interior, with the support of the White House Office of Science  
16 and Technology Policy, will establish a working group comprising agencies such as the Department  
17 of Agriculture and the Environmental Protection Agency to expand critical minerals production in  
18 the US by identifying sites where such minerals could be produced and processed.

19 Moreover, the US Development Finance Corporation will expand international investments  
20 in projects that will increase critical minerals production capacity where this will benefit the US.

21 The White House recommended that Congress authorize new and expanded incentives to  
22 spur consumer adoption of US-made EVs.

23 “We recommend Congress support \$5-billion in investments to electrify the federal fleet  
24 with US-made EVs, and \$15-billion in infrastructure investment to build a national charging  
25 infrastructure to facilitate the adoption of EVs,” it said.

26 Moreover, earlier this month, the Biden administration issued an executive order that called  
27 for half of all vehicles sold in the US to be emission-free by 2030 – an ambitious goal that would  
28 necessitate significant investment in EV infrastructure, including a comprehensive charging station

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1 network, for example.

2 US National Mining Association (NMA) president and CEO Rich Nolan said that the Biden  
3 administration's energy and infrastructure agenda cannot be accomplished without mining, which  
4 will provide a significant boost for the country's mining sector at all levels.

5 "Infrastructure projects are incredibly materials intensive. President Biden's plan for EV  
6 adoption and electrification across the economy, energy and transportation sectors holds the  
7 potential for significant additional investment in domestic mining," he tells Engineering News &  
8 Mining Weekly.

9 He explains that it has been estimated that \$1-trillion of infrastructure spending could  
10 require an additional six-million tons of steel, 110 000 t of copper and 140 000 t of aluminum a  
11 year.

12 In terms of EVs, the general sentiment in the automotive industry seems to be that the  
13 demand curve is going to become vertical and that the supply chains are "going to explode", Nolan  
14 says.

15 "I don't believe that the pivot to EVs is solely dependent on the Biden plan. Automakers and  
16 the capital markets have already made investments in battery production and announced a rapid  
17 transition," he says.

18 For example, vehicle manufacturer General Motors has announced that it will invest \$27-  
19 billion in EVs over the next five years, while competitor Ford will double its investment in EVs to  
20 \$22-billion.

21 Meanwhile, earnings reported for EV manufacturer Tesla's first quarter of 2021 were  
22 record-breaking, comprising a profit of \$438-million on revenues of \$10.39-billion. During that  
23 period, Tesla delivered about 184 800 vehicles – double the number recorded for the same quarter  
24 of last year.

25 The World Bank estimates that battery minerals production could increase by 500% by 2050  
26 to meet the growing demand for advanced energy technologies.

27 "The demand is coming; just how fast is the question," Nolan comments.

28 Although rare-earth or critical minerals are being "hotly pursued" for battery production, the

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1 importance of copper – which he says is plentiful in the US – should not be discounted: “EVs use  
2 three times as much copper as the standard combustion engine vehicle. Copper will form the  
3 arteries of an electrified future”.

4 Nolan adds that the US will need to produce the same amount of copper in the next 25 years  
5 as was produced globally in the past 5 000 years. Silver is also critical for building a more  
6 sustainable energy economy. For example, about 10% of silver demand stemmed from photovoltaic  
7 solar in 2019.

8 “Silver demand from EVs and 5G is building. The electrification of everything means more  
9 metals are needed,” he says.

10 While the US can theoretically develop domestic mines in the medium to long term to  
11 supply the minerals and metals needed to secure supply chains for the EV revolution, short-term  
12 demand leaves the US with no choice but to source supply from overseas.

13 “It should be no surprise that the Biden administration is looking to all available resources to  
14 meet those immediate needs,” Nolan says.

15 Canada is a natural ally from which to source such resources and Hillary Clinton's friend  
16 rank Giustra controls a big part of the mining industry in Canada.

17 Canadian cobalt producer First Cobalt president and CEO Trent Mell explains that the world  
18 relies largely on China for the supply of most materials required to produce a lithium-ion battery  
19 cell.

20 “The current battery supply chain is very high risk. The impact of geopolitical changes could  
21 lead to a change in tariff environments or outright bans on Chinese exports of certain materials  
22 deemed critical to economic growth,” he says, noting that these risks must drive a localisation of  
23 battery supply chains in coming years.

24 “First Cobalt and other Canadian companies are well positioned to capture value in the  
25 battery supply chain, which would otherwise be captured by Chinese refiners,” Mell says.

26 He adds that politicians in Canada and the US must ensure that some of the money being  
27 invested in the EV industry “finds its way to mining and refining”.

28 Nolan adds, however, that it would be a mistake to interpret a strategy intent on ensuring



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1 immediate supply as a long-term comprehensive strategy that will effectively meet US mineral  
2 demand for the future.

3 “We have to improve the competitiveness of the US industry on the global stage. Therefore,  
4 the NMA is working closely with Congress and the Biden administration to address unnecessary  
5 permitting delays and ensure timely access to our vast resources,” Nolan says.

6 Mell explains that there are several stages that must be developed in North America for the  
7 supply chain to become truly integrated. These stages comprise the mining of critical raw materials,  
8 refining them to battery-grade sulphates, further refining them into battery precursor materials, then  
9 into cathode and anode materials, followed by cell manufacturing.

10 The cells are put into modules and packs, which end up in EVs and other battery-energy  
11 storage systems.

12 “Over the past few years, we have seen numerous announcements relating to EV plants and  
13 battery manufacturing sites, but few developments are being made on the raw material front,” he  
14 comments.

15 Critical minerals producers from allied countries – such as First Cobalt – have a unique  
16 opportunity to fill this gap in the short to medium term while the US develops its own resources.

17 However, for the US, the race is on and world war three could be caused by electric vehicle  
18 mining.

19 However, US miners are competing with critical mineral producers in other countries that  
20 have fully fledged government backing, while not necessarily operating under environmental or  
21 labour standards that are as stringent as those in the US.

22 Therefore, Nolan says that domesticising EV supply chains would not only serve the US  
23 economy in the long term but would also be more environmentally and socially responsible.


24 “The most responsible sourcing is here at home, in the US, where we know these minerals  
25 will be mined under the strictest environmental and labour standards globally,” he concludes.

26 In the end, the U.S. will never get the rare earth minerals that Goldman Sachs stock market  
27 hypsters have pitched. The smoke and mirrors pipe dreams of EV mining orgasms will evaporate  
28 into toxic wastelands, false hopes and international wars. Trillions of dollars of BS stock market




1 pump-and-dump is already underway but it will only lawsuits, market crashes and no actual  
 2 affordable cars. China and Russia have already cut off all of the non-domestic lithium ion battery  
 3 minerals. The U.S. had better get a clue and go for ANYTHING except lithium ion batteries.

4 [\\$1 Trillion Motherlode of Lithium and Gold Discovered in ...](#)

5  [https://www.mining.com/1-trillion-motherlode-of-lithium-and-gold-discovered-in-](https://www.mining.com/1-trillion-motherlode-of-lithium-and-gold-discovered-in-afghanistan/)  
 6 [afghanistan/](https://www.mining.com/1-trillion-motherlode-of-lithium-and-gold-discovered-in-afghanistan/)

7 A recently unearthed 2007 United States Geological Service survey appears to have  
 8 discovered nearly \$1 **trillion in** mineral deposits in **Afghanistan**, far [...] \$1 **Trillion** Motherlode  
 9 of **Lithium** and ...

10 [The Spoils of the War on Afghanistan, One Trillion Dollars ...](#)

11  [https://www.globalresearch.ca/the-spoils-of-the-war-on-afghanistan-one-trillion-dollars-](https://www.globalresearch.ca/the-spoils-of-the-war-on-afghanistan-one-trillion-dollars-of-lithium-the-future-of-silicon-valley-may-lie-in-the-mountains-of-afghanistan/5375266)  
 12 [of-lithium-the-future-of-silicon-valley-may-lie-in-the-mountains-of-afghanistan/5375266](https://www.globalresearch.ca/the-spoils-of-the-war-on-afghanistan-one-trillion-dollars-of-lithium-the-future-of-silicon-valley-may-lie-in-the-mountains-of-afghanistan/5375266)

13 The vast discovery could very well propel **Afghanistan** — a war-ravaged land with a  
 14 population of 31 million largely uneducated Pashtuns and Tajiks, and whose primary exports today  
 15 are opium, hashish, and marijuana — into becoming the world's next "Saudi Arabia of **lithium**,"  
 16 according to an internal Pentagon memo cited by the New York Times. ...

17 [Afghanistan is sitting on mineral wealth worth over \\$3 ...](#)

18  [https://tfipost.com/2020/07/afghanistan-is-sitting-on-mineral-wealth-worth-over-3-](https://tfipost.com/2020/07/afghanistan-is-sitting-on-mineral-wealth-worth-over-3-trillion-and-its-future-depends-on-it/)  
 19 [trillion-and-its-future-depends-on-it/](https://tfipost.com/2020/07/afghanistan-is-sitting-on-mineral-wealth-worth-over-3-trillion-and-its-future-depends-on-it/)

20 **Lithium** is also crucial in technological equipment like mobile phones and laptops. An even  
 21 more encouraging study was conducted in the year 2017 by the Afghan Ministry of Mines and  
 22 Petroleum. It pegged **Afghanistan's** mineral wealth at 3 **trillion US dollars**. This is equivalent of  
 23 some of the biggest world economies like India.

24 [Afghan Lithium Stock Scam - a Washington Dc Organized ...](#)

25  <https://xyzcase.weebly.com/afghan-lithium-stock-scam.html>

26 As of today the Afghan war has cost the U.S. over one and a half **TRILLION dollars** and,  
 27 according to sociologists and economists, yielded no known benefits. The **lithium**, the gas pipelines  
 28 and global goodwill goals have all turned out to be false hopes. Yale University calculates that 80%


1 of the cash sent to **Afghanistan** disappeared in corruption.

2 [Mining in Afghanistan - Wikipedia](#)

3  [https://en.wikipedia.org/wiki/Mining\\_in\\_Afghanistan](https://en.wikipedia.org/wiki/Mining_in_Afghanistan)

4 Mining in **Afghanistan** is controlled by the Ministry of Mines and Petroleum, which is  
5 headquartered in Kabul with regional offices in other parts of the country. **Afghanistan** has over  
6 1,400 mineral fields, containing barite, chromite, coal, copper, gold, iron ore, lead, natural gas,  
7 petroleum, precious and semi-precious stones, salt, sulfur, talc, and zinc, among many other  
8 minerals.

9 [Rare Earth: Afghanistan Sits on \\$1 Trillion in Minerals](#)

10  [https://www.nbcnews.com/science/science-news/rare-earth-afghanistan-sits-1-trillion-](https://www.nbcnews.com/science/science-news/rare-earth-afghanistan-sits-1-trillion-minerals-n196861)  
11 [minerals-n196861](https://www.nbcnews.com/science/science-news/rare-earth-afghanistan-sits-1-trillion-minerals-n196861)

12 **Afghanistan** may be sitting on one of the richest troves of minerals in the world, valued at  
13 nearly \$1 **trillion**, scientists say. ... zinc, mercury and **lithium**. ... while the Afghan government's ...

14 [The New Oil: Afghanistans Lithium Mines worth Trillions of ...](#)

15  [https://totallyfreepress.wordpress.com/2011/03/15/the-new-oil-afghanistans-lithium-](https://totallyfreepress.wordpress.com/2011/03/15/the-new-oil-afghanistans-lithium-mines-worth-trillions-of-dollars/)  
16 [mines-worth-trillions-of-dollars/](https://totallyfreepress.wordpress.com/2011/03/15/the-new-oil-afghanistans-lithium-mines-worth-trillions-of-dollars/)

17 According to other reports the total mineral riches of **Afghanistan** may be worth over three  
18 **trillion** US **dollars**. ... similar to those necessary for the deposits in **Afghanistan** went out of  
19 production due to cheaper production from **lithium** containing brines. **Afghanistan** invited 200  
20 global companies for the development of its mines.

21 [\\$1 Trillion Trove of Rare Minerals Revealed Under Afghanistan](#)

22  <https://www.livescience.com/47682-rare-earth-minerals-found-under-afghanistan.html>

23 Despite being one of the poorest nations in the world, **Afghanistan** may be sitting on one of  
24 the richest troves of minerals in the world, valued at nearly \$1 **trillion**, according to U.S. scientists.

25 [Why is Afghanistan unable to extract its vast mineral ...](#)

26  [https://www.aljazeera.com/indepth/features/afghanistan-unable-extract-vast-mineral-](https://www.aljazeera.com/indepth/features/afghanistan-unable-extract-vast-mineral-wealth-190527111748895.html)  
27 [wealth-190527111748895.html](https://www.aljazeera.com/indepth/features/afghanistan-unable-extract-vast-mineral-wealth-190527111748895.html)

28 Timory also criticised what he described as the overly politicised nature of decision making

1 in the **mining** sector, as he warned of further **corruption**. In late 2018, **Afghanistan's** membership  
2 in ...

3 [Minerals have become integral to conflict in Afghanistan ...](#)

4  <https://ariananews.af/mining-has-become-integral-to-conflict-in-afghanistan-undp/>

5 **Mining** financing conflict The report also stated **mining** has been financing conflict and that  
6 the control of minerals extraction by insurgent groups has meant that they have been financing and  
7 fuelling conflict while undermining the legitimacy of the Afghan government and further spreading  
8 **corruption** and violence.

9 [Illegal mining costs Afghanistan millions annually: UN](#)

10  [https://www.aa.com.tr/en/asia-pacific/illegal-mining-costs-afghanistan-millions-annually-](https://www.aa.com.tr/en/asia-pacific/illegal-mining-costs-afghanistan-millions-annually-un/1952838)  
11 [un/1952838](https://www.aa.com.tr/en/asia-pacific/illegal-mining-costs-afghanistan-millions-annually-un/1952838)

12 World, Asia - Pacific Illegal **mining** costs **Afghanistan** millions annually: UN UN report  
13 says control of mineral extraction by insurgents, local militia, and warlords causes **corruption**,  
14 violence

15 [Corruption and Conflict in Afghanistan | Global Witness ...](#)

16  <https://www.globalwitness.org/en/campaigns/afghanistan/>

17 **Afghanistan's** new **mining** law risks falling short in the fight against **corruption** The  
18 worrying weaknesses in the new Afghan **mining** law must be revised if it is to allow the country's  
19 huge mineral wealth to benefit its people, rather than continue fuelling **corruption** and conflict

20  
21 **An Example Of A Filed FOIA Seeking More Information. This FOIA has been stone-**  
22 **walled and never responded to due to political embarresment by Obama officials who are**  
23 **running cover-ups**

24  
25 *Sept 30, 2020 - Copies Filed With NARA.GOV and all public outlets.*

26  
27 *Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552 et seq. and the implementing regulations*  
28 *of your office we make the following request for FOIA data.*

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1 Plaintiffs Office requests that your office produce the following within twenty business days and further seeks  
2 expedited review of this request for the reasons identified below:

3 1. All records discussing, referring, or relating to all meetings or communications between staff and related  
4 parties or their representatives including minutes of those meetings, or any memoranda written about these meetings by  
5 your employees and contractors who were present or have knowledge of these actions related to FST, Limnia, DCT or  
6 XP Vehicles proposals for their proven patented, trade secret and patent pending technologies to use domestic coal  
7 waste for plasma processing into clean energy storage systems on which the U.S. Department Of Energy has worked  
8 with Plaintiffs Teams via Ameren Energy, Lawrence Livermore, Sandia and Department of Energy HQ efforts, and  
9 direct Department of Energy funding, support and advisory efforts since, at least, 2000 and which Department of  
10 Energy officials blockaded in order to favor Tesla Motors, Solyndra and companies which acquired their energy  
11 minerals from Afghanistan, Bolivia and China (Assets of which are owned by corrupt U.S. Senators and Department of  
12 Energy staff via proven Goldman Sachs, JP Morgan and related investment bank accounts) and other corrupt regions  
13 through corrupt rare earth mining scams relative to the White House Executive Order Of September 30, 2020, per the  
14 following:

15 White House Executive Order Places U.S. Emphasis On Plaintiffs Coal Waste Processing Technology

16 "Executive Order on Addressing the Threat to the Domestic Supply Chain from Reliance on Critical Minerals  
17 from Foreign Adversaries

18 Economy & Jobs

19 Issued on:

20  
21 By the authority vested in me as President by the Constitution and the laws of the United States of America,  
22 including the International Emergency Economic Powers Act (50 U.S.C. 1701 et seq.) (IEEPA), the National  
23 Emergencies Act (50 U.S.C. 1601 et seq.) (NEA), and section 301 of title 3, United States Code,

24 I, DONALD J. TRUMP, President of the United States of America, find that a strong America cannot be  
25 dependent on imports from foreign adversaries for the critical minerals that are increasingly necessary to maintain  
26 Plaintiffs economic and military strength in the 21st century. Because of the national importance of reliable access to  
27 critical minerals, I signed Executive Order 13817 of December 20, 2017 (A Federal Strategy To Ensure Secure and  
28 Reliable Supplies of Critical Minerals), which required the Secretary of the Interior to identify critical minerals and

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1 made it the policy of the Federal Government “to reduce the Nation’s vulnerability to disruptions in the supply of  
2 critical minerals.” Pursuant to my order, the Secretary of the Interior conducted a review with the assistance of other  
3 executive departments and agencies (agencies) that identified 35 minerals that (1) are “essential to the economic and  
4 national security of the United States,” (2) have supply chains that are “vulnerable to disruption,” and (3) serve “an  
5 essential function in the manufacturing of a product, the absence of which would have significant consequences for  
6 Plaintiffs economy or Plaintiffs national security.”

7       These critical minerals are necessary inputs for the products Plaintiffs military, national infrastructure, and  
8 economy depend on the most. Plaintiffs country needs critical minerals to make airplanes, computers, cell phones,  
9 electricity generation and transmission systems, and advanced electronics. Though these minerals are indispensable to  
10 Plaintiffs country, we presently lack the capacity to produce them in processed form in the quantities we need.  
11 American producers depend on foreign countries to supply and process them. For 31 of the 35 critical minerals, the  
12 United States imports more than half of its annual consumption. The United States has no domestic production for 14 of  
13 the critical minerals and is completely dependent on imports to supply its demand. Whereas the United States  
14 recognizes the continued importance of cooperation on supply chain issues with international partners and allies, in  
15 many cases, the aggressive economic practices of certain non-market foreign producers of critical minerals have  
16 destroyed vital mining and manufacturing jobs in the United States.

17       Plaintiffs dependence on one country, the People’s Republic of China (China), for multiple critical minerals is  
18 particularly concerning. The United States now imports 80 percent of its rare earth elements directly from China, with  
19 portions of the remainder indirectly sourced from China through other countries. In the 1980s, the United States  
20 produced more of these elements than any other country in the world, but China used aggressive economic practices to  
21 strategically flood the global market for rare earth elements and displace its competitors. Since gaining this advantage,  
22 China has exploited its position in the rare earth elements market by coercing industries that rely on these elements to  
23 locate their facilities, intellectual property, and technology in China. For instance, multiple companies were forced to  
24 add factory capacity in China after it suspended exports of processed rare earth elements to Japan in 2010, threatening  
25 that country’s industrial and defense sectors and disrupting rare earth elements prices worldwide.

26       The United States also disproportionately depends on foreign sources for barite. The United States imports  
27 over 75 percent of the barite it consumes, and over 50 percent of its barite imports come from China. Barite is of  
28 critical importance to the hydraulic fracturing (“fracking”) industry, which is vital to the energy independence of the

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1 *United States. The United States depends on foreign sources for 100 percent of its gallium, with China producing*  
2 *around 95 percent of the global supply. Gallium-based semiconductors are indispensable for cellphones, blue and*  
3 *violet light-emitting diodes (LEDs), diode lasers, and fifth-generation (5G) telecommunications. Like for gallium, the*  
4 *United States is 100 percent reliant on imports for graphite, which is used to make advanced batteries for cellphones,*  
5 *laptops, and hybrid and electric cars. China produces over 60 percent of the world's graphite and almost all of the*  
6 *world's production of high-purity graphite needed for rechargeable batteries.*

7 *For these and other critical minerals identified by the Secretary of the Interior, we must reduce Plaintiffs*  
8 *vulnerability to adverse foreign government action, natural disaster, or other supply disruptions. Plaintiffs national*  
9 *security, foreign policy, and economy require a consistent supply of each of these minerals.*

10 *I therefore determine that Plaintiffs Nation's undue reliance on critical minerals, in processed or unprocessed*  
11 *form, from foreign adversaries constitutes an unusual and extraordinary threat, which has its source in substantial part*  
12 *outside the United States, to the national security, foreign policy, and economy of the United States. I hereby declare a*  
13 *national emergency to deal with that threat.*

14 *In addition, I find that the United States must broadly enhance its mining and processing capacity, including*  
15 *for minerals not identified as critical minerals and not included within the national emergency declared in this order.*  
16 *By expanding and strengthening domestic mining and processing capacity today, we guard against the possibility of*  
17 *supply chain disruptions and future attempts by Plaintiffs adversaries or strategic competitors to harm Plaintiffs*  
18 *economy and military readiness. Moreover, additional domestic capacity will reduce United States and global*  
19 *dependence on minerals produced in countries that do not endorse and pursue appropriate minerals supply chain*  
20 *standards, leading to human rights violations, forced and child labor, violent conflict, and health and environmental*  
21 *damage. Finally, a stronger domestic mining and processing industry fosters a healthier and faster-growing economy*  
22 *for the United States. Mining and mineral processing provide jobs to hundreds of thousands of Americans whose daily*  
23 *work allows Plaintiffs country and the world to "Buy American" for critical technology.*

24 *I hereby determine and order:*

25 *Section 1. (a) To address the national emergency declared by this order, and pursuant to subsection 203(a)(1)*  
26 *(B) of IEEPA (50 U.S.C. 1702(a)(1)(B)), the Secretary of the Interior, in consultation with the Secretary of the*  
27 *Treasury, the Secretary of Defense, the Secretary of Commerce, and the heads of other agencies, as appropriate, shall*  
28 *investigate Plaintiffs Nation's undue reliance on critical minerals, in processed or unprocessed form, from foreign*

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adversaries. The Secretary of the Interior shall submit a report to the President, through the Assistant to the President for National Security Affairs, the Assistant to the President for Economic Policy, and the Assistant to the President for Trade and Manufacturing Policy, within 60 days of the date of this order. That report shall summarize any conclusions from this investigation and recommend executive action, which may include the imposition of tariffs or quotas, other import restrictions against China and other non-market foreign adversaries whose economic practices threaten to undermine the health, growth, and resiliency of the United States, or other appropriate action, consistent with applicable law.

(b) By January 1, 2021, and every 180 days thereafter, the Secretary of the Interior, in consultation with the heads of other agencies, as appropriate, shall inform the President of the state of the threat posed by Plaintiffs Nation's reliance on critical minerals, in processed or unprocessed form, from foreign adversaries and recommend any additional actions necessary to address that threat.

(c) The Secretary of the Interior, in consultation with the heads of other agencies, as appropriate, is hereby authorized to submit recurring and final reports to the Congress on the national emergency declared in this order, consistent with section 401(c) of the NEA (50 U.S.C. 1641(c)) and section 204(c) of IEEPA (50 U.S.C. 1703(c)).

Sec. 2. (a) It is the policy of the United States that relevant agencies should, as appropriate and consistent with applicable law, prioritize the expansion and protection of the domestic supply chain for minerals and the establishment of secure critical minerals supply chains, and should direct agency resources to this purpose, such that:

(i) the United States develops secure critical minerals supply chains that do not depend on resources or processing from foreign adversaries;

(ii) the United States establishes, expands, and strengthens commercially viable critical minerals mining and minerals processing capabilities; and

(iii) the United States develops globally competitive, substantial, and resilient domestic commercial supply chain capabilities for critical minerals mining and processing.

(b) Within 30 days of the date of this order, the heads of all relevant agencies shall each submit a report to the President, through the Director of the Office of Management and Budget, the Assistant to the President for National Security Affairs, and the Assistant to the President for Economic Policy, that identifies all legal authorities and appropriations that the agency can use to meet the goals identified in subsection (a) of this section.

(c) Within 60 days of the date of this order, the heads of all relevant agencies shall each submit a report as

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provided in subsection (b) of this section that details the agency's strategy for using the legal authorities and appropriations identified pursuant to that subsection to meet the goals identified in subsection (a) of this section. The report shall explain how the agency's activities will be organized and how it proposes to coordinate relevant activities with other agencies.

(d) Within 60 days of the date of this order, the Director of the Office of Science and Technology Policy shall submit a report to the President, through the Director of the Office of Management and Budget, the Assistant to the President for National Security Affairs, the Assistant to the President for Economic Policy, and the Assistant to the President for Trade and Manufacturing Policy, that describes the current state of research and development activities undertaken by the Federal Government that relate to the mapping, extraction, processing, and use of minerals and that identifies future research and development needs and funding opportunities to strengthen domestic supply chains for minerals.

(e) Within 45 days of the date of this order, the Secretary of State, in consultation with the United States Trade Representative, shall submit a report to the President, through the Assistant to the President for National Security Affairs, the Assistant to the President for Economic Policy, and the Assistant to the President for Trade and Manufacturing Policy, that details existing and planned efforts and policy options to:

(i) reduce the vulnerability of the United States to the disruption of critical mineral supply chains through cooperation and coordination with partners and allies, including the private sector;

(ii) build resilient critical mineral supply chains, including through initiatives to help allies build reliable critical mineral supply chains within their own territories;

(iii) promote responsible minerals sourcing, labor, and business practices; and

(iv) reduce the dependence of the United States on minerals produced using methods that do not adhere to responsible mining standards.

Sec. 3. The Secretary of the Interior, in consultation with the Secretary of Defense, shall consider whether the authority delegated at section 306 of Executive Order 13603 of March 16, 2012 (National Defense Resources Preparedness) can be used to establish a program to provide grants to procure or install production equipment for the production and processing of critical minerals in the United States.

Sec. 4. (a) Within 30 days of the date of this order, the Secretary of Energy shall develop and publish guidance (and, as appropriate, shall revoke, revise, or replace prior guidance, including loan solicitations) clarifying the extent



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1 to which projects that support domestic supply chains for minerals are eligible for loan guarantees pursuant to Title  
2 XVII of the Energy Policy Act of 2005, as amended (42 U.S.C. 16511 et seq.) (“Title XVII”), and for funding awards  
3 and loans pursuant to the Advanced Technology Vehicles Manufacturing incentive program established by section 136  
4 of the Energy Independence and Security Act of 2007, as amended (42 U.S.C. 17013) (“the ATVM statute”). In  
5 developing such guidance, the Secretary:

6 (i) shall consider whether the relevant provisions of Title XVII can be interpreted in a manner that better  
7 promotes the expansion and protection of the domestic supply chain for minerals (including the development of new  
8 supply chains and the processing, remediation, and reuse of materials already in interstate commerce or otherwise  
9 available domestically);

10 (ii) shall examine the meaning of the terms “avoid, reduce, or sequester” and other key terms in section  
11 16513(a) of title 42, United States Code, which provides that the Secretary “may make guarantees under this section  
12 only for projects that — (1) avoid, reduce, or sequester air pollutants or anthropogenic emissions of greenhouse gases;  
13 and (2) employ new or significantly improved technologies as compared to commercial technologies in service in the  
14 United States at the time the guarantee is issued”;

15 (iii) shall consider whether relevant provisions of the ATVM statute may be interpreted in a manner that better  
16 promotes the expansion and protection of the domestic supply chain for minerals (including the development of new  
17 supply chains and the processing, remediation, and reuse of materials already in interstate commerce or otherwise  
18 available domestically), including in such consideration the application of these provisions to minerals determined to  
19 be components installed for the purpose of meeting the performance requirements of advanced technology vehicles; and

20 (iv) shall examine the meaning of the terms “qualifying components” and other key terms in subsection  
21 17013(a) of title 42, United States Code.

22 (b) Within 30 days of the date of this order, the Secretary of Energy shall review the Department of Energy’s  
23 regulations (including any preambles thereto) interpreting Title XVII and the ATVM statute, including the regulations  
24 published at 81 Fed. Reg. 90,699 (Dec. 15, 2016) and 73 Fed. Reg. 66,721 (Nov. 12, 2008), and shall identify all such  
25 regulations that may warrant revision or reconsideration in order to expand and protect the domestic supply chain for  
26 minerals (including the development of new supply chains and the processing, remediation, and reuse of materials  
27 already in interstate commerce or otherwise available domestically). Within 90 days of the date of this order, the  
28 Secretary shall propose for notice and comment a rule or rules to revise or reconsider any such regulations for this

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purpose, as appropriate and consistent with applicable law.

Sec. 5. The Secretary of the Interior, the Secretary of Agriculture, the Secretary of Commerce, the Administrator of the Environmental Protection Agency, the Secretary of the Army (acting through the Assistant Secretary of the Army for Civil Works), and the heads of all other relevant agencies shall, as appropriate and consistent with applicable law, use all available authorities to accelerate the issuance of permits and the completion of projects in connection with expanding and protecting the domestic supply chain for minerals.

Sec. 6. The Secretary of the Interior, the Secretary of Energy, and the Administrator of the Environmental Protection Agency shall examine all available authorities of their respective agencies and identify any such authorities that could be used to accelerate and encourage the development and reuse of historic coal waste areas, material on historic mining sites, and abandoned mining sites for the recovery of critical minerals.

Sec. 7. Amendment. Executive Order 13817 is hereby amended to add the following sentence to the end of section 2(b): “This list shall be updated periodically, following the same process, to reflect current data on supply, demand, and concentration of production, as well as current policy priorities.”

Sec. 8. Definitions. As used in this order:

(a) the term “critical minerals” means the minerals and materials identified by the Secretary of the Interior pursuant to section 2(b) of Executive Order 13817, as amended by this order; and

(b) the term “supply chain,” when used with reference to minerals, includes the exploration, mining, concentration, separation, alloying, recycling, and reprocessing of minerals.

Sec. 9. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect:

(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

DONALD J. TRUMP

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1           THE WHITE HOUSE,  
2           September 30, 2020."

3           -----  
4  
5           As The U.S. Government Inspector General's office, The FBI, DOJ, OSC, FTC and FEC are aware, we have  
6           filed criminal referrals in this matter and demanded payment for Plaintiffs damages in the state-financed corruption in  
7           this matter caused by government employees and contractors exposed in Congressional, FBI, DOJ, OSC, FTC and FEC  
8           investigations. This information has been publicly relayed to the news media and the voting population of America and  
9           Europe. Former White House executives, U.S. Senators and Department of Energy staff have been proven to have held  
10          financial interests in these off-shore mining efforts and federal investigators can swear, warrant, and certify to this fact.  
11          Presidential candidates have been proven to have, or now hold, vast assets in Chinese and other foreign corrupt rare-  
12          earth mining quid pro quo scams.

13          Plaintiffs Office seeks all responsive records regardless of format, medium, or physical characteristics. In  
14          conducting your search, please understand the terms "records," "communications," and "documents" in their broadest  
15          sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any  
16          kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles,  
17          telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or  
18          discussions. Plaintiffs request includes any attachments to these records.

19          No category of material should be omitted from search, collection, and production.

20          You may not exclude searches of files or emails in the personal custody of your officials, such as personal  
21          email accounts, which are known by Plaintiffs investigators to have been used to attempt to avoid transparency.

22          Records of official business conducted using unofficial systems or stored outside of official files is subject to  
23          the Federal Records Act and FOIA. It is not adequate to rely on policies and procedures that require officials to move  
24          such information to official systems within a certain period of time; Plaintiffs Office has a right to records contained in  
25          those files even if material has not yet been moved to official systems or if officials have, through negligence or  
26          willfulness, failed to meet their obligations.

27  
28          Custodian searches are still required; agencies may not have direct access to files stored in .PST files, outside of

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1 network drives, in paper format, or in personal email accounts. In addition, please note that in conducting a  
2 "reasonable search" as required by law, you must employ the most up-to-date technologies and tools available, in  
3 addition to searches by individual custodians likely to have responsive information. Recent technology may have  
4 rendered the your prior FOIA practices unreasonable. In light of the government-wide requirements to manage  
5 information electronically by the end of 2016, it is no longer reasonable to rely exclusively on custodian-driven  
6 searches.

7 Furthermore, agencies that have adopted the NARA Capstone program, or similar policies, now maintain  
8 emails in a form that is reasonably likely to be more complete than individual custodians' files. For example, a  
9 custodian may have deleted a responsive email from his or her email program, but the GOVT's archiving tools would  
10 capture that email under Capstone. Accordingly, Plaintiffs Office insists that the your offices use the most up-to-date  
11 technologies to search for responsive information and take steps to ensure that the most complete repositories of  
12 information are searched. If any potentially responsive records have been destroyed and/or transferred to other  
13 agencies or offices, such as the National Archives and Records Agency (NARA), then I request copies of the destruction  
14 or transfer slips as well as any other documentation relating to, mentioning or describing said transfer or destruction,  
15 to include but not be limited to confirmation that your offices have no other copies of said records. Under the FOIA  
16 Improvement Act of 2016, agencies must adopt a presumption of disclosure, withholding information "only if . . .  
17 disclosure would harm an interest protected by an exemption" or "disclosure is prohibited by law." If it is your position  
18 that any portion of the requested records is exempt from disclosure, please advise.

19 Plaintiffs Office requests that you provide an index of those documents as required under *Vaughn v. Rosen*,  
20 484 F.2d 820 (D.C. Cir. 1973), cert. denied, 415 U.S. 977 (1974). As you are aware, a Vaughn index must describe  
21 each document claimed as exempt with sufficient specificity "to permit a reasoned judgment as to whether the material  
22 is actually exempt under FOIA." Moreover, the Vaughn index "must describe each document or portion thereof  
23 withheld, and for each withholding it must discuss the consequences of disclosing the sought-after information."  
24 Further, "the withholding agency must supply 'a relatively detailed justification, specifically identifying the reasons why  
25 a particular exemption is relevant and correlating those claims with the particular part of a withheld document to  
26 which they apply.'"

27 See - *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy* , 827 F.3d 145, 149-50 (D.C. Cir. 2016); cf.  
28 *Judicial Watch, Inc. v. Kerry* , 844 F.3d 952, 955-56 (D.C. Cir. 2016) *Id.* at 8 ("The Government argues that because

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1 the agency had a policy requiring [the official] to forward all of his emails from his [personal] account to his business  
2 email, the [personal] account only contains duplicate agency records at best. Therefore, the Government claims that  
3 any hypothetical deletion of the [personal account] emails would still leave a copy of those records intact in [the  
4 official's] work email. However, policies are rarely followed to perfection by anyone. At this stage of the case, the Court  
5 cannot assume that each and every work-related email in the [personal] account was duplicated in [the official's] work  
6 email account." (citations omitted))

7 See- Presidential Memorandum-Managing Government Records, 76 Fed. Reg. 75,423 (Nov. 28, 2011),  
8 <http://bit.ly/2qOnSLU>; Office of Mgmt. & Budget Exec. Office of the President, Memorandum for the Heads of  
9 Executive Departments & Independent Agencies, "Managing Government Records Directive," M-12-18 (Aug. 24,  
10 2012), <http://bit.ly/2raBimr>

11 See - FOIA Improvement Act of 2016 § 2 (Pub. L. No. 114-185)

12 See- Founding Church of Scientology v. Bell , 603 F.2d 945, 949 (D.C. Cir. 1979)

13 See - King v. U.S. Dep't of Justice , 830 F.2d 210, 223-24 (D.C. Cir. 1987) (emphasis in original)

14 See - Id. at 224 (citing Mead Data Central, Inc. v. U.S. Dep't of the Air Force , 566 F.2d 242, 251 (D.C. Cir.  
15 1977))

16 In the event some portions of the requested records are properly exempt from disclosure, please disclose any  
17 reasonably segregable nonexempt portions of the requested records. If it is your position that a document contains non-  
18 exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation  
19 impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the  
20 document. Claims of non-segregability must be made with the same degree of detail as required for claims of  
21 exemptions in a Vaughn index. If a request is denied in whole, please state specifically that it is not reasonable to  
22 segregate portions of the record for release. In addition to the records requested above, Plaintiffs Office also requests  
23 records describing the processing of this request, including records sufficient to identify search terms used and  
24 locations and custodians searched and any tracking sheets used to track the processing of this request. If your offices  
25 use FOIA questionnaires or certifications completed by individual custodians or components to determine whether they  
26 possess responsive materials or to describe how they conducted searches, we also request any such records prepared in  
27 connection with the processing of this request.

28 You should institute a preservation hold on information responsive to this request.

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1 *Plaintiffs Office intends to pursue all legal avenues to enforce its right of access under FOIA, including*  
2 *litigation and press conferences if necessary. Accordingly, your offices are on notice that litigation is reasonably*  
3 *possible and that Plaintiffs offices have prevailed in past related federal litigation.*

4 *Where possible, please provide responsive material in electronic format by email in PDF format.*

5 *Plaintiffs non-political, criminal investigation, non-commercial public interest Congressional investigation*  
6 *and distribution group requests rolling production of these records as they are located and reviewed. Please be aware*  
7 *that under 5 U.S.C. § 552(a)(6)(A), a FOIA request is considered constructively denied after twenty business days and*  
8 *is subject to an appeal on that basis.*

9 *Fee Waiver*

10 *In accordance with 5 U.S.C. § 552(a)(4)(A)(iii), Plaintiffs Office, and citizen complainants, request a waiver of*  
11 *fees associated with processing this request for records. The subject of this request concerns the operations of the*  
12 *federal government, and the disclosures will likely contribute to a better understanding of relevant government*  
13 *procedures by the general public in a significant way.*

14  
15 *Moreover, Plaintiffs Office provides research to major online news organizations viewed by millions of voters and*  
16 *therefore we are entitled to a fee waiver on the grounds that disclosure of the information sought is in the public*  
17 *interest because it is likely to contribute significantly to public understanding of the operations or activities of the*  
18 *government and is not primarily in the commercial interest of the requester. Regardless, we are willing to pay fees for*  
19 *this request up to \$50 without prior approval. If you estimate that the fees will exceed this limit, please notify us first.*

20  
21 ***Expedited Processing***

22 *Pursuant to 5 U.S.C. § 552(a)(6)(E)(1) and 43 C.F.R. § 2.20(a)(2), Plaintiffs Office requests that your office*  
23 *expedite the processing of this request.*

24 *Requests shall receive expedited processing when a requester demonstrates "an urgency to inform the public*  
25 *about an actual or alleged Federal Government activity, if made by a person who is primarily engaged in disseminating*  
26 *information." First, Plaintiffs Office is an organization "primarily engaged in disseminating information." (finding that*  
27 *Plaintiffs Office is a "representative of the news media" because it "gathers information of potential interest to a*  
28 *segment of the public, uses its editorial skills to turn the raw material into distinct work, and distributes that work to an*

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audience.")

We are also investigating criminal activity, for Plaintiffs own litigation and law enforcement reporting, by employees and contractors of your offices, in that such activity harmed us.

See - Mead Data Central, 566 F.2d at 261

See - Am. Civil Liberties Union v. Department of Justice, 321 F. Supp.

2d 24, 29 n.5 (D.D. Cir. 200))

These records are urgently needed to inform the public about actual or alleged government activity. Specifically, Plaintiffs Office contends there exists an urgency to inform the public about what matters of state that were discussed and that those disclosures are helpful to the current White House Administration and the American public in their efforts to end political corruption. The courts have found that the issue of news coverage to be especially critical in determining whether a "compelling need" exists for expedited FOIA processing. The Court have asserted that the "ultimate conclusion" with regards to expedited processing relies on important underlying facts, such as "the credibility of a claimant's allegations regarding government activity, the existence of a threat to physical safety, or whether an issue is the subject of news coverage."

Certification

The above information is true and correct to the best of Plaintiffs knowledge.

Further Correspondence

To ensure that this request is properly construed, that searches are conducted in an adequate but efficient manner, and that extraneous costs are not incurred, Plaintiffs Office welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, Plaintiffs Office and your offices can decrease the likelihood of costly and time-consuming litigation, and public press conferences, in the future.

This matter affects every voting citizen because, if we can't get justice in America, then no voter will believe they can either.

We look forward to your response.

For additional confirmation of precedents confirming Plaintiffs rights to this data, please review the following:

See - Al-Fayed v. Central Intelligence Agency, 254 F.3d 300, 306 (D.C. Cir. 2001) (Al-Fayed) Id. at 308.



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(emphasis added)

*See - : Wadelton v. Department of State, 13-0412 ESH, 2013 WL 1760853 (D.D. Cir. 2013) (Wadelton*

*See - Id. Document 10, Filed 04/25/13, Page 6 of 8 (citing ACLU-NC v.DOD , 2006 WL 1469418, at \*1-2; Amer. Civil Liberties Union of N. Cal. v. Dep't of Justice , No. C 04-4447, 2005 WL 588354, at \*5-7 (N.D. Cal Mar. 11, 2005))*

*See - Edmonds v. FBI , CIV.A. 02-1294 (ESH), 2002 WL 32539613 (D.D.C. Dec. 3, 2002)*

*See - U.S.C. § 552(a)(6)(E)(v)(II*

As if the **Trump** declaration of the multi-trillion dollar value of rare earth minerals was not enough to underscore the victim's assertion about the scope of the corruption issue, the **Biden Administration** has now trumpeted the size of the issue: **Silicon Valley tech oligarchs** control politics, politicians and public policy decisions in order to control ideologies and treasury money distributions. Their bribes pay to keep their monopolies going.

Fuel Cells like those used in the Honda, Toyota, Kia, Hyundai, and all other non-Detroit controlled cars, work perfectly but the tech cartel hates them because they beat lithium batteries by miles. Steam, capacitors, air pressure, and hundreds of other energy solutions do not cause the genocides, child labor camps, explosions, self-generating fires, cancer-causing smoke and other evils that lithium batteries cause. All alternatives to lithium batteries can be entirely produced domestically. Lithium requires invasions and CIA covert actions in foreign nations that already hate the USA. China, Chile, Afghanistan and other nations have already plotted dog-leash restrictions on U.S. access to rare earth minerals.

Risking the entire fate of America, these tech oligarchs and their surrogates, have spent billions of dollars to say every other technology, particularly fuel cells (which they fear most).

China promoted Joe Biden and Barack Obama for President because China knew that they would push electric cars..and China controls the electric car materials resources. Quite a scheme. It is not a question of "If" China will hold the U.S. hostage. It already has.



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# U.S. Identifies Vast Mineral Riches in Afghanistan



Tyler Hicks/The New York Times

A bleak Ghazni Province seems to offer little, but a Pentagon study says it may have among the world's largest deposits of lithium.

By [JAMES RISEN](#)  
Published: June 13, 2010

WASHINGTON — The United States has discovered nearly \$1 trillion in untapped mineral deposits in [Afghanistan](#), far beyond any previously known reserves and enough to fundamentally alter the Afghan economy and perhaps the Afghan war itself, according to senior American government officials.

## At War

Notes from Afghanistan, Pakistan, Iraq and other areas of conflict in the post-9/11 era.  
[Go to the Blog »](#)

## Multimedia

The previously unknown deposits — including huge veins of iron, copper, cobalt, gold and critical industrial metals like [lithium](#) — are so big and include so many minerals that are essential to modern industry that Afghanistan could eventually be

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In Theaters

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## EXHIBIT 28 – How ANYONE Can Verify These Facts

Every major federal investigator and intelligence officer has confirmed these facts. Many of them PROVIDED this evidence. Congressional hearings have also proven these facts. Thousands of experts can prove these facts in any equitable jury trial. Everyone has heard of [Mossack Fonseca](#) ( <https://www.esquire.com/news-politics/politics/a29536656/panama-papers-mossack-fonseca-investigations-russia-trump-organization/> ) and the [Panama Papers](#) ( <https://www.icij.org/investigations/panama-papers/new-panama-papers-leak-reveals-mossack-fonsecas-chaotic-scramble/> ) but there are 187+ other crooked CPA firms that Diane Feinstein, Elon Musk, Nancy Pelosi, Larry Page, John Doerr, Steve Westly, Reid Hoffman, et al, use with even [dirtier secrets](#) ( [https://www.sec.gov/files/Algo\\_Trading\\_Report\\_2020.pdf](https://www.sec.gov/files/Algo_Trading_Report_2020.pdf) ) about stock market rigging and money laundering. [Jeffrey Epstein's](#) ( <https://www.businessinsider.com/jeffrey-epstein-politicians-connections-donations-2019-7?op=1> ) Political Mafia corruptions and perversions are the heart-and-soul of the Cartel that these people operate. The investigators at every federal agency now have this proof IN HAND and the public should demand prosecutions of the criminals or the resignations of any officials running the cover-ups. Plaintiffs stated that, [Since Before 2005, "Plaintiffs Witnessed Social Media Companies Engage in Illegal Campaign Contributions With Their 'Algorithm' Censorship And Blacklisting"](#) ( [http://testimony111.com/index.php?post/Since-Before-2005%2C-We-Witnessed-Social-Media-Companies-Engage-in-Illegal-Campaign-Contributions-With-Their-Algorithm-Censorship-And-Blacklisting\\_](http://testimony111.com/index.php?post/Since-Before-2005%2C-We-Witnessed-Social-Media-Companies-Engage-in-Illegal-Campaign-Contributions-With-Their-Algorithm-Censorship-And-Blacklisting_) ).  
Thus the cover-ups are still going on.

<https://justthenews.com/accountability/political-ethics/monfbi-sexcapades-bureau-rocked-illicit-office-romances-workplace>

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The Plaintiffs have requested, under FOIA law, that all agencies provide all records discussing, referring, or relating to all meetings or communications between staff and related parties or their representatives including minutes of those meetings, or any memoranda written about these meetings by their employees and contractors who were present or have knowledge of these actions related to the “ *The Obama Administration Vendetta, Reprisal, Revenge Manipulations Of Plaintiffs Funding As Payback For Plaintiffs Provision Of Support To A Criminal Investigation*” per the following facts as told to the FBI and DOJ in this federal filing.

**This is an actual FOIA that has also been stone-walled:**

**“Whereas**, numerous Congressional reports, IT staff reports and security industry reports have verified that agency servers and files, including those upon which Plaintiffs records were housed, have been hacked, moved, deleted and edited by outside third parties including Chinese and Russian hackers, bored teens and hired opposition research operatives and that the hardware level back-doors for SPECTRE and many other incursion sets still exist in agency Cisco, Intel, Juniper Networks and other Network devices now connected to government file networks at GOVT, SSA, FEC, and other agencies and this fact is indisputable. (The supporting GOVT files are neither lost nor unrecoverable. The supporting Kleiner Perkins and Greylock case files are neither lost nor unrecoverable. At the very least, China, Russian or Brazilian teen hackers have them up for sale on the Dark Web. The NSA certainly has copies of them.)

**FOR THE RECORD:**

Per the FBI, DOJ, FCC and Congressional investigators:

It is widely verified by the U.S. DOJ that hackers such as Wang Dong, Sun Kailiang, Wen Xinyu, Huang Zhenyu, and Gu Chunhui, who were officers in Unit 61398 of the Third Department of the Chinese People’s Liberation Army (PLA) and Aleksei Sergeyevich Morenets, 41, Evgenii Mikhaylovich, Serebriakov, 37, Ivan Sergeyevich Yermakov, 32, Artem Andreyevich Malyshev, 30, and Dmitriy Sergeyevich Badin, 27, who were each assigned to Military Unit 26165, and Oleg Mikhaylovich Sotnikov, 46, and Alexey Valerevich Minin, 46, who were also GRU officers, and hackers-for-hire including Kevin David Mitnick, Adrian Lamo, Albert Gonzalez, Matthew Bevan, Richard Pryce, Jeanson James Ancheta, Michael Calce, Kevin Poulsen, Jonathan James, The hacker known as ASTRA, The hacker known as GUCIFER, The hacker known as ANON 4CHAN and THOUSANDS of other individuals had free access and free reign throughout NSA, FBI, SSA, DOJ, OPM, CIA and other government servers via the SPECTRE, EMOTET, PRIME ROOTKIT, SERCOMM BACKDOOR, NOTPETYA, MELTDOWN, MASTERKEY, RYZENFALL, FALLOUT, CHIMERA, and hundreds of other back doors and penetration vulnerabilities in Cisco, Intel, Juniper Networks, AMD, and other equipment. Additionally, all of the core server penetration tools used by the CIA and the NSA were hacked by foreign nations and their core source code posted on the internet for all to use.

It is ludicrous for any agency to state that any government servers, prior to 2020, were not widely penetrated and manipulated. The hackers are all known to have sold, or provided the results of their work to famous politicians for use against their competitors.

Nancy Pelosi is an owner of the hacking manipulation firm: CROWDSTRIKE. Crowdstrike and famous California Senators had the easy means, the motivations, the staffing, the resources and the known engagement of services to manipulate SSA, DOJ, SEC, FTC and other agency decisions and filing records in order to harm Plaintiffs, reporters and whistle-blowers who reported their crimes and corruptions.

( <http://www.opensecrets.org/personal-finances/nancy-pelosi/net-worth?cid=N00007360&year=2011> )

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( [https://www.realclearinvestigations.com/articles/2020/10/09/pelosi\\_takes\\_big\\_stake\\_in\\_crowdstrike\\_democrat-tied\\_linchpin\\_of\\_russiagate\\_125557.html](https://www.realclearinvestigations.com/articles/2020/10/09/pelosi_takes_big_stake_in_crowdstrike_democrat-tied_linchpin_of_russiagate_125557.html) )

The hackers, daily, use the common tools of:

A. Injection. Injection flaws, such as SQL, NoSQL, OS, and LDAP injection, occur when untrusted data is sent to an interpreter as part of a command or query. The attacker's hostile data can trick the interpreter into executing unintended commands or accessing data without proper authorization.

B. Broken Authentication. Application functions related to authentication and session management are often implemented incorrectly, allowing attackers to compromise passwords, keys, or session tokens, or to exploit other implementation flaws to assume other users' identities temporarily or permanently.

C. Sensitive Data exposure. Many web applications and APIs do not properly protect sensitive data, such as financial, healthcare, and PII. Attackers may steal or modify such weakly protected data to conduct credit card fraud, identity theft, or other crimes. Sensitive data may be compromised without extra protection, such as encryption at rest or in transit, and requires special precautions when exchanged with the browser.

D. XML External Entities (XXE). Many older or poorly configured XML processors evaluate external entity references within XML documents. External entities can be used to disclose internal files using the file URI handler, internal file shares, internal port scanning, remote code execution, and denial of service attacks.

E. Broken Access Control. Restrictions on what authenticated users are allowed to do are often not properly enforced. Attackers can exploit these flaws to access unauthorized functionality and/or data, such as access other users' accounts, view sensitive files, modify other users' data, change access rights, etc.

F. Security Misconfiguration. Security misconfiguration is the most commonly seen issue. This is commonly a result of insecure default configurations, incomplete or ad hoc configurations, open cloud storage, misconfigured HTTP headers, and verbose error messages containing sensitive information. Not only must all operating systems, frameworks, libraries, and applications be securely configured, but they must be patched/updated in a timely fashion.

G. Cross-Site Scripting XSS. XSS flaws occur whenever an application includes untrusted data in a new web page without proper validation or escaping, or updates an existing web page with user-supplied data using a browser API that can create HTML or JavaScript. XSS allows attackers to execute scripts in the victim's browser which can hijack user sessions, deface web sites, or redirect the user to malicious sites.

H. Insecure Deserialization. Insecure deserialization often leads to remote code execution. Even if deserialization flaws do not result in remote code execution, they can be used to perform attacks, including replay attacks, injection attacks, and privilege escalation attacks.

I. Using Components with Known Vulnerabilities. Components, such as libraries, frameworks, and other software modules, run with the same privileges as the application. If a vulnerable component is exploited, such an attack can facilitate serious data loss or server takeover. Applications and APIs using components with known vulnerabilities may undermine application defenses and enable various attacks and impacts.

J. Insufficient Logging & Monitoring. Insufficient logging and monitoring, coupled with missing or ineffective integration with incident response, allows attackers to further attack systems, maintain persistence, pivot to more systems, and tamper, extract, or destroy data. Most breach studies show time to detect a breach is over 200 days, typically detected by external parties rather than internal processes or monitoring.

**Whereas**, Staff within the Department of Energy, including those who worked directly with Lachlan Seward, Steven Chu and other top executives and at The White House have revealed the insider corruption schemes, at those offices, to Plaintiffs and Plaintiffs investigators.

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1 **Whereas**, Plaintiffs own elected Senate and Congressional representatives have had their staff arrested for spying for  
2 China and a shocking number of the companies in this scam now belong to Chinese interests via strange machinations,  
per CBS News, and this fact is indisputable.

3 **Whereas**, Plaintiffs own elected Senate and Congressional representatives have had their staff engage the services of  
4 Fusion GPS and other spy agency-like services to attack Plaintiffs and competitive adversaries who competed with their  
campaign financiers and this fact is indisputable.

5 **Whereas**, Silicon Valley has a “mafia-like” organization known in the news media as “*The PayPal Mafia*”, AKA “*The*  
6 *Deep State*”, AKA “*The Silicon Valley Tech Mafia*”, which is known to exist by their shared communications to  
7 organize a private agenda; their shared use of the same banks, CPA’s, lobbyists, corrupt tech law firms and political  
8 operatives; their shared statements of agenda at tech conferences; their shared black-lists on Venture Beat, Gust, Google  
Docs and “Angelgate” (Disclosed by the founder of Tech Crunch) collusion meeting venues; and FBI research. It is  
widely documented that member Reid Hoffman funds street riots and that boss Eric Schmidt manipulates intelligence  
agency resources for political and profiteering personal goals. The DOJ-produced “*Silicon Valley No Poaching*” class-  
action case deeply discusses this group and their collusion and these facts are indisputable.

9 **Whereas**, “*The Silicon Valley Tech Mafia*” bosses James Bronkema, Tom Perkins and members of Greylock Capital  
10 did disclose the existence of this active, organized, collusion-based “*Silicon Valley Tech Mafia*” organization, which is  
operating in violation of federal RICO laws, to Plaintiffs and solicited their membership. Photographs of the members  
11 dressed as Mafia godfathers, to glorify their intent, and their emails and tech conference statements very clearly refer to  
their intent to emulate an organized crime entity. Steven Greer, a “*cover-up expert*” has multiple feature films on Netflix  
12 about a Cabal of these people setting out to control technology industries. Jeffrey Epstein was a favored member of this  
group. Over 10,000 news articles feature disturbing research about the actions and agenda of this group of sociopath frat  
13 boy billionaires and these facts are indisputable.

14 **Whereas**, Plaintiffs own elected Senate and Congressional representatives family members have stayed at Plaintiffs  
home and dated Plaintiffs and obviously relayed deep operational information to Plaintiffs about the activities of other  
15 family members and this fact is indisputable.

16 **Whereas**, Plaintiffs own elected Senate and Congressional representatives have placed over \$100 Million of profits in  
their family bank accounts based on business investments in direct competition to Plaintiffs and this fact is indisputable.

17 **Whereas**, Plaintiffs properly filed Applications from 2007 forward were stalled, with-held, delayed, blocked, denied,  
18 manipulated and reprisal-distorted to revenge-punish Plaintiffs for Plaintiffs 2007 assistance to law enforcement in a  
major bribery and payola investigation involving State and Federal treasury funds and stock manipulations by Plaintiffs  
own elected representatives and this fact is indisputable.

19 **Whereas**, Plaintiffs own elected Senate and Congressional representatives engaged in a very public battle with the  
20 Central Intelligence Agency involving the hacking of each other’s computers and this fact is indisputable.

21 **Whereas**, Plaintiffs hired Covington and Burling, including Bruce Demming and Plaintiffs associates, to describe “how  
22 it all works In Washington” and how Eric Holder and Steven Chu were placed in their positions by Covington and  
Burling.

23 **Whereas**, The President of The United States is currently engaged in a highly public battle with the FBI, CIA and third  
24 parties over the abuse of top spy agency and law enforcement agencies for political vendetta purposes and this fact is  
indisputable and proves, at the highest, level that federal agency bosses regularly use federal agency resources, such as  
25 GOVT agency bosses, for harms against citizens.

26 **Whereas**, public news reports and Congressional Special Committee reports prove that previous White House staff and  
27 Plaintiffs own elected Senate and Congressional representatives have engaged in tens of millions of dollars of spy  
agency-type harassment, defamation, opposition research, character assassination, hacking and decision manipulation  
28 using taxpayer and third-party contractor resources and this fact is indisputable.



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**Whereas**, Jofi Joseph, and over 20 other Obama Administration officials, were whistle-blowers about activities within the Obama White House and exposed such activities voluminously on social media and in covert Google docs accounts. They, along with articles such as: <https://theintercept.com/2016/04/22/googles-remarkably-close-relationship-with-the-obama-white-house-in-two-charts/> and FBI and FTC reports revealed that fact that Google/YouTube/Alphabet/Et Al controlled and staffed most of the Obama White House. **Google Boss Larry Page and Tesla Boss Elon Musk were co-investors, bromance boyfriends, collaborative lobbyists and had a shared agenda and controlled White House and GOVT decisions.** Google ‘advised’ McKinsey and Covington and Burling on the hiring for the White House and The U.S. Government with all of their friends. The Google global media control system hides any good news about Tesla’s competitors, especially Plaintiffs, and authors defamation and attack videos and hit job articles and puts those attack media items at the top of all Google and Youtube search results. They openly bragged about it. ( <https://truthstreammedia.com/2013/06/02/googles-regime-change-agent-jared-cohen/> ). Google is a criminal empire that told the Obama White House and Department of Energy what to do!

**Whereas**, Plaintiffs have no affiliation with any political party and Plaintiffs only personal political agenda is to “end political corruption and crony capitalism via 100% legal innovation efforts”.

**Whereas**, one of Plaintiffs lawyers now works in the White House and sued GOVT, and GOVT and SSA staff knew of this and those staff ordered retribution holds or manipulations of Plaintiffs rights and funding because they hate the current President of the United States for personal reasons as their emails, social media, voting records and events participation proves and this fact is indisputable.

**Whereas**, Plaintiffs, as part of a group of Plaintiffs, won a federal lawsuit against The U.S. Government and GOVT proving that Plaintiffs Applications for funding were manipulated by agencies infected with corruption, bias, favoritism and crony capitalism and this fact is indisputable.

**Whereas**, No known party within, or consulting to the U.S. Department of Energy, for Plaintiffs application reviews, since 2007, is not politically opposed to any person opposing the Obama White House Administration and Plaintiffs did participate in a successful lawsuit against corruption in the Obama White House and THUS each and EVERY GOVT staffer who reviewed Plaintiffs benefits applications was conflicted in their interests, including the GOVT IG office, and unqualified to do so and this fact is indisputable.

**Whereas**, The IRS lost the very public legal “Lois Lerner” case which proved that the White House regularly uses its power to manipulate federal agencies in order to target those that are disliked in the public and that similar cases and IG reports have proven this across every agency and the GOVT and this fact is indisputable.

**Whereas**, numerous Senate and White House letters on official letterhead and videos and press photography prove that Plaintiffs have had a decades long relationship with White House, Department of Energy senior officials (Ranging from Warren Buffet, To Hillary Clinton, To Monica Lewinsky’s hiring manager, to Mayor’s of San Francisco to seated White House Vice Presidents , et al) and, thus, had adequate access to knowledge of deep operations and crimes within those offices and this fact is indisputable.

**It is thus well known and proven that:**

1. Plaintiffs applications since 2007 were illegally stalled, with-held, delayed, blocked, denied, manipulated and reprisal-distorted to punish Plaintiffs for their assistance to law enforcement in a major bribery and payola investigation involving State and Federal treasury funds and stock manipulations by Plaintiffs own elected representatives and GOVT staff beholden to those officials.
2. Plaintiffs are Federal Witnesses and Whistle-blowers in an active, ongoing federal corruption investigation who has had their rights to a lawyer and other civil rights blocked. By blocking Plaintiffs funds AND blocking their rights AND disabling Plaintiffs with these attacks and subverting their access to federal Legal Services Corporation-provided legal support and by black-listing law-firms who sought to help Plaintiffs, a violation of Plaintiffs State and Federal Constitutional Rights has been undertaken.

3. Operational command and control of hacking services, GOVT decision procedures and practices, file manipulations, records deletions and related manipulations of Plaintiffs applications are clearly proven and sourced to Plaintiffs own elected Senate and Congressional representatives, GOVT officials and White House staff.

**Therefore:**

**It is demanded that Plaintiffs full retroactive awards and global potential profits from their vehicle manufacturing and energy companies from 2007 forward, including damages, be provided at this time per the provided comparative calculation metrics document.**

**Plaintiffs are seeking to settle this matter rapidly with an agreed upon financial amount to cover damages and back-monies owed but we will legally collect the funds from the GOVT and federal accounts in any case. Since GOVT has previously wired funds to Plaintiffs projects, it should be a trivial matter to transfer those funds in order to finalize this matter.**

Re: The **comparative calculation metrics**: The damages amounts in the attached report are based on fully verified, government reported values from carbon credit sales, revenues, stock market exploitation of GOVT funding matters and other profit GAAP reported amounts and FBI revealed sums, from December 2008 to today, that the GOVT-crony competitors and their investors made in documented profits, revenues, tax write-offs, tax waivers and other upsides that Plaintiffs lost because of the corruption damages, rights blockades and reprisal attacks. Additionally, damages from benefit funds blockades, black-lists and other losses of revenue are incorporated in those standards-based, court precedent comps. Additionally, monies owed for whistle-blower and federal informant fees are calculated per industry precedents (such as the Walter T. Department of Energy whistle-blower award ( <https://www.latimes.com/nation/la-na-hanford-whistleblower-settlement-20150813-story.html>) and the known annual budget for FBI informant payments provided to Congress in previous budget reports). Plaintiffs provided the documented case evidence to federal investigators since 1986. Additionally, salary losses based on the averaged CEO salaries of the CEO of Tesla Motors, Fisker Motors, Bloom Energy, Solyndra and General Motors are included as industry standards for the energy and automotive market in the same time-frame. Additionally, standard pain and suffering inclusions are incorporated.

The filed FOIA's require that each agency provide all records of review of bias or conflict of interest, since 2007, in Plaintiffs application and federal dispute processes.

The FOIA's seek all responsive records regardless of format, medium, or physical characteristics. In conducting your search, please understand the terms "records," "communications," and "documents" in their broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. Plaintiffs seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions. Plaintiffs request includes any attachments to these records.

No category of material should be omitted from search, collection, and production. You may not exclude searches of files or emails in the personal custody of your officials, such as personal email accounts, which are known by Plaintiffs investigators to have been used to attempt to avoid transparency.

Records of official business conducted using unofficial systems or stored outside of official files is subject to the Federal Records Act and FOIA. It is not adequate to rely on policies and procedures that require officials to move such information to official systems within a certain period of time; Plaintiffs Office has a right to records contained in those files even if material has not yet been moved to official systems or if officials have, through negligence or willfulness, failed to meet their obligations.

Custodian searches are still required; agencies may not have direct access to files stored in .PST files, outside of network drives, in paper format, or in personal email accounts. In addition, please note that in conducting a "reasonable search" as required by law, you must employ the most up-to-date technologies and tools available, in addition to searches by individual custodians likely to have responsive information. Recent technology may have rendered the your prior FOIA practices unreasonable. In light of the government-wide requirements to manage information electronically



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1 by the end of 2016, it is no longer reasonable to rely exclusively on custodian-driven searches.

2 Furthermore, agencies that have adopted the NARA Capstone program, or similar policies, now maintain emails in a  
3 form that is reasonably likely to be more complete than individual custodians' files. For example, a custodian may have  
4 deleted a responsive email from Plaintiffs or her email program, but the GOVT's archiving tools would capture that  
5 email under Capstone. Accordingly, Plaintiffs Office insists that the your offices use the most up-to-date technologies to  
6 search for responsive information and take steps to ensure that the most complete repositories of information are  
7 searched. If any potentially  
8 responsive records have been destroyed and/or transferred to other agencies or offices, such as the National Archives  
9 and Records Agency (NARA), then I request copies of the destruction or transfer slips as well as any other  
10 documentation relating to, mentioning or describing said transfer or destruction, to include but not be limited to  
11 confirmation that your offices have no other copies of said records. Under the FOIA Improvement Act of 2016,  
12 agencies must adopt a presumption of disclosure, withholding information "only if . . . disclosure would harm an  
13 interest protected by an exemption" or  
14 "disclosure is prohibited by law." If it is your position that any portion of the requested records is exempt from  
15 disclosure, please advise.

16 Plaintiffs Office has requested that you provide an index of those documents as required under Vaughn v. Rosen, 484  
17 F.2d 820 (D.C. Cir. 1973), cert. denied, 415 U.S. 977 (1974). As you are aware, a Vaughn index must describe each  
18 document claimed as exempt with sufficient specificity "to permit a reasoned judgment as to whether the material is  
19 actually exempt under FOIA." Moreover, the Vaughn index "must describe each document or portion thereof withheld,  
20 and for each withholding it must discuss the consequences of disclosing the sought-after information." Further, "the  
21 withholding agency must supply 'a relatively detailed justification, specifically identifying the reasons why a particular  
22 exemption is relevant and correlating those claims with the particular part of a withheld document to which they apply.'"

23 See - Competitive Enter. Inst. v. Office of Sci. & Tech. Policy , 827 F.3d 145, 149-50 (D.C. Cir. 2016); cf. Judicial  
24 Watch, Inc. v. Kerry , 844 F.3d 952, 955-56 (D.C. Cir. 2016) Id. at 8 ("The Government argues that because the agency  
25 had a policy requiring [the official] to forward all of his emails from his [personal] account to his business email, the  
26 [personal] account only contains duplicate agency records at best. Therefore, the Government claims that any  
27 hypothetical deletion of the [personal account] emails would still leave a copy of those records intact in [the official's]  
28 work email. However, policies are rarely followed to perfection by anyone. At this stage of the case, the Court cannot  
assume that each and every work-related email in the [personal] account was duplicated in [the official's] work email  
account." (citations omitted))

See- Presidential Memorandum-Managing Government Records, 76 Fed. Reg. 75,423 (Nov. 28, 2011),  
<http://bit.ly/2qOnSLU>; Office of Mgmt. & Budget Exec. Office of the President, Memorandum for the Heads of  
Executive Departments & Independent Agencies, "Managing Government Records Directive," M-12-18 (Aug. 24,  
2012), <http://bit.ly/2raBimr>

See - FOIA Improvement Act of 2016 § 2 (Pub. L. No. 114-185)

See- Founding Church of Scientology v. Bell , 603 F.2d 945, 949 (D.C. Cir. 1979)

See - King v. U.S. Dep't of Justice , 830 F.2d 210, 223-24 (D.C. Cir. 1987) (emphasis in original)

See - Id. at 224 (citing Mead Data Central, Inc. v. U.S. Dept of the Air Force , 566 F.2d 242, 251  
(D.C. Cir. 1977))

In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably  
segregable nonexempt portions of the requested records. If it is your position that a document contains non-exempt  
segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation  
impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the  
document. Claims of non-segregability must be made with the same degree of detail as required for claims of  
exemptions in a Vaughn index.

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1 If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for  
2 release. In addition to the records requested above, Plaintiffs Office also requests records describing the processing of  
3 this request, including records sufficient to identify search terms used and locations and custodians searched and any  
4 tracking sheets used to track the processing of this request.

5 If your offices use FOIA questionnaires or certifications completed by individual custodians or components to  
6 determine whether they possess responsive materials or to describe how they conducted searches, we also request any  
7 such records prepared in connection with the processing of this request.

8 You should institute a preservation hold on information responsive to this request.

9 Plaintiffs Office intends to pursue all legal avenues to enforce its right of access under FOIA and damages recovery,  
10 including litigation and press conferences if necessary. Accordingly, your offices are on notice that litigation is  
11 reasonably possible and that Plaintiffs offices have prevailed in past related federal litigation.

12 Where possible, please provide responsive material in electronic format by email in PDF format. Plaintiffs non-political,  
13 criminal investigation, non-commercial public interest Congressional investigation and distribution group requests  
14 rolling production of these records as they are located and reviewed.

15 Please be aware that under 5 U.S.C. § 552(a)(6)(A), a FOIA request is considered constructively denied after twenty  
16 business days and is subject to an appeal on that basis.

#### 17 **Fee Waiver**

18 In accordance with 5 U.S.C. § 552(a)(4)(A)(iii), Plaintiffs Office, and citizen complainants, request a waiver of fees  
19 associated with processing this request for records. The subject of this request concerns the operations of the federal  
20 government, and the disclosures will likely contribute to a better understanding of relevant government procedures by  
21 the general public in a significant way. Moreover, Plaintiffs Office provides research to major online news  
22 organizations viewed by millions of  
23 voters and therefore we are entitled to a fee waiver on the grounds that disclosure of the information sought is in the  
24 public interest because it is likely to contribute significantly to public understanding of the operations or activities of the  
25 government and is not primarily in the commercial interest of the requester. Regardless, we are willing to pay fees for  
26 this request up to \$50 without prior approval. If you estimate that the fees will exceed this limit, please notify us first.

#### 27 **Expedited Processing**

28 Pursuant to 5 U.S.C. § 552(a)(6)(E)(1) and 43 C.F.R. § 2.20(a)(2), Plaintiffs Office requests that your office expedite  
the processing of this request.

Requests shall receive expedited processing when a requester demonstrates "an urgency to inform the public about an  
actual or alleged Federal Government activity, if made by a person who is primarily engaged in disseminating  
information." First, Plaintiffs Office is an organization "primarily engaged in disseminating information." (finding that  
Plaintiffs Office is a "representative of the news media" because it "gathers information of potential interest to a segment  
of the public, uses its editorial skills to turn the raw material into distinct work, and distributes that work to an  
audience.")

Plaintiffs are also investigating criminal activity, for Plaintiffs own litigation and law enforcement reporting, by  
employees and contractors of your offices, in that such activity harmed us.

See - Mead Data Central, 566 F.2d at 261

See - Am. Civil Liberties Union v. Department of Justice, 321 F. Supp.  
2d 24, 29 n.5 (D.D. Cir. 200))

These records are urgently needed to inform the public about actual or alleged government activity. Specifically,  
Plaintiffs Office contends there exists an urgency to inform the public about what matters of state that were discussed

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and that those disclosures are helpful to the current White House Administration and the American public in their efforts to end political corruption. The courts have found that the issue of news coverage to be especially critical in determining whether a "compelling need" exists for expedited FOIA processing. The Court have asserted that the "ultimate conclusion" with regards to expedited processing relies on important underlying facts, such as "the credibility of a claimant's allegations regarding government activity, the existence of a threat to physical safety, or whether an issue is the subject of news coverage."

**Certification**

The above information is true and correct to the best of Plaintiffs knowledge.

**Further Correspondence**

To ensure that this request is properly construed, that searches are conducted in an adequate but efficient manner, and that extraneous costs are not incurred, Plaintiffs Office welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, Plaintiffs Office and your offices can decrease the likelihood of costly and time-consuming litigation, and public press conferences, in the future.

This matter affects every voting citizen because, if we can't get justice in America, then no voter will believe they can either. Plaintiffs have made certain that every voters does know the facts of this matter via mass social media.

For additional confirmation of precedents confirming Plaintiffs rights to this data, please review the following:

See - Al-Fayed v. Central Intelligence Agency, 254 F.3d 300, 306 (D.C. Cir. 2001) (Al-Fayed) Id. at 308. (emphasis added)

See - : Wadelton v. Department of State, 13-0412 ESH, 2013 WL 1760853 (D.D. Cir. 2013) (WadeltonSee - Id. Document 10, Filed 04/25/13, Page 6 of 8 (citing ACLU-NC v.DOD , 2006 WL 1469418, at

\*1-2; Amer. Civil Liberties Union of N. Cal. v. Dep't of Justice , No. C 04-4447, 2005 WL 588354, at \*5-7 (N.D. Cal Mar. 11, 2005))

See - Edmonds v. FBI , CIV.A. 02-1294 (ESH), 2002 WL 32539613 (D.D.C. Dec. 3, 2002)

See - U.S.C. § 552(a)(6)(E)(v)(II)

**Demand And Confirmation Of Intent:**

To be clear, this is not simply a FOIA request. Many FOIA requests have already been filed.

This is a **DEMAND FOR HUMAN RIGHTS AND CONSTITUTIONAL RIGHTS DAMAGES PAYMENTS AND REINSTATEMENT OF BLOCKADED RIGHTS!**

**THIS IS ALSO A DEMAND FOR STATE SPONSORED LEGAL COUNSEL AND FINANCIAL SERVICES SUPPORT AND/OR FOR DOJ TO TAKE ON THIS CASE AND REPRESENT Plaintiffs**

**Notes:**

Every single person at The U.S. Government is familiar with this case, the cover-ups and Plaintiffs ability to bring FBI and SEC-class investigations and punishments to bear. It is foolish for any party at GOVT or DOJ to deny knowledge of this matter. Thousands of movies, newscasts, articles, FBI reports and Congressional reports cover this matter in great detail and they ALL reach the same conclusion that crimes were committed by GOVT and White House staff and cover-ups are ongoing. It is a proven fact that EVERY major official and staffer at GOVT is dedicated to operating a cover-up of these crimes and they intend to offer no resources or aid. They are shredding documents and deleting hard drives as fast as they can but hackers are widely known to have harvested all evidence from GOVT servers years ago.

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1 Congressional IT reports confirm this. The evidence exists in the hands of third parties and often suddenly appears on Wikileaks and other repositories.

2 Federal, Congressional, Law enforcement and forensic experts have already begun collection/garnishment development  
3 for these funds. A settlement today will eliminate great pain and shame for EVERY person at agencies, later. Please expedite settlement proceedings for the sake of all concerned.

4 Due to the novel creation and construction of the Section 136 funds bank account, the government can neither move,  
5 remove, block off nor delay this effort. As you are aware, multiple Presidents and billionaires have tried to do so and none of them, from either party, could touch it, so no party should even think about trying to hide or redirect the money.

6 The largest number of search engine results, across the globe, on EVERY search engine, about **ANY** public agency  
7 have to do with the "**Department of Energy Green Corruption**". This reality will keep that legacy going for the rest of time. You can settle this now or watch what happens when millions of citizens crowd-source an anti-corruption process,  
8 100% legally, using their home computers and cell phones. Do public officials really want their name right next to Steven Chu's black-stained profile for all of time?

9 Every SINGLE thing Plaintiffs told GOVT that was going to happen in 2008 HAS happened. The cases WERE payola.  
10 The batteries DID blow-up! Afghanistan WAS totally corrupt! Solyndra WAS a Scam! Chu DID blockade Fuel Cells to help Musk! GOVT staff WERE hiding corruption plans in their private emails and text messages! The GOVT servers  
11 WERE hacked over 200 times! The IBM Consulting Service WAS conducting manipulated reviews! Steve Rattner WAS a crook! Etc, etc, etc!...History and Congressional investigations have proven that GOVT was wrong on 100% of  
12 the assumptions and Plaintiffs have been proven 100% right.

13 The crimes, and the circumstances of the Plaintiffs of these crimes, must be made right TODAY, or each politician, and  
14 their staff, will become what corrupt Steven Chu and indicted Eric Holder have become in the history books: **Political Stains!** What will the legacy be of those we are asking to resolve this be? Plaintiffs asked Steven Chu that TO HIS FACE in 2009. Plaintiffs all know the answer now.

15 If Plaintiffs have to execute the garnishment taking of their funds and the shaming of each individual involved in the  
16 crimes and cover-ups, 100% legally, the headaches will last forever! Cancel culture is only a hint of it. Lawsuits are just a tiny part of it. Public shame, indictments and midnight visits from the FBI barely describe how bad it can get for the  
17 felon public agency staff that manipulate Democracy.

18 Some past efforts have been funded by anonymous billionaires who fund 501 C 3 and 501 C 4 charities by paying  
19 outside lawyers directly or requesting pro bono services. Steve Jobs widow and Bezo's ex wife, alone, have the financial resources to fund the largest lawsuits and private investigator teams in "*the history of the world*". There are  
20 now THOUSANDS of such activist billionaires. Plaintiffs intend to go to every one, everywhere in the world, to get an anti-corruption program underway and agency offices who continue cover-ups may end up being VERY sad that they  
21 did not settle this when they could.

22 Do Defendants want to face that kind of legal warfare for the rest of their lives when this can all be settled, to Plaintiffs satisfaction, with one check of far lower expense, TODAY?

23 It is a waste of taxpayer funds and resources to allow the hubris of crooked Senator's and insane Silicon Valley search  
24 engine billionaires to exacerbate this case endlessly because they are pissed off that they got caught doing crimes. Since Congress shows no interest in supporting the law, proposed by Plaintiffs, to curtail hit-jobs and collusion by billionaires,  
25 then one must assume that the opportunity to use those measures goes both ways.

26 This **human rights** and **legal rights** effort has been accomplished with an ad hoc CIA/FBI-type team of reporters,  
27 intelligence officers, FBI agents, lawyers, forensic researchers, AI corruption-hunting digital database engines, private investigators, inside whistle-blowers, ICIJ investigative reporters and any member of the public that wishes to join the  
28 crowd-sourced research and authoring efforts. Members of Congress helped create this effort. ANYBODY is allowed to help us. These are ad hoc common-interest parties who have assembled a forensic research team known as *The Advanced Voluntary Electronic National Group-Excellence Reinforcement Services*. Modern AI engines at Stanford, CERN and other universities hum all night long tracking down political crooks like a million XKEYSCORE (

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1 <https://en.wikipedia.org/wiki/XKeyscore> ) DB engines on steroids. EVERY public official must ask themselves: “**What**  
2 **side of the chart do I want to be on when these algorithms spit out the results of every dime in all my secret accounts,**  
3 **anywhere on Earth, and covert stock market interests, I have transacted and taken through secret conduits, covert**  
4 **real estate scams and PACs”? A large number of active FBI, CIA, DOJ, SEC and other agency personnel are**  
5 supportive of Plaintiffs 100% legal anti-corruption effort because they too disdain criminals operating within Plaintiffs  
6 Democracy.

7 Plaintiffs are available for any and all meetings with Senior White House, FBI, DOJ, SEC, Congressional and related  
8 agency staff who have federal “Q-Sensitive” security clearance, provided that the State has provided Plaintiffs with an  
9 equitable law firm to represent him as counsel and appropriate financial representatives. Plaintiffs must make certain  
10 that he is aware which side, any party who contacts him, is on. There are only two sides: 1.) *The Cover-up Operators*  
11 and 2.) *The Prosecutors*, each type proves their intent by their actions...”  
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## EXHIBIT 28 - The Political Payola Money Laundering And Stock Manipulations

### Laundering The Politicians Dirty Cash

Billions of dollars of payola in this case has been laundered via U.S. real estate transactions in the last five years, according to a new report by a Washington, D.C.-based think tank. Senators Pelosi, Harris, Feinstein, Reed and their associates own some of the larges swathes of illicit money laundered real estate in America.

By using a database of over 100 publicly reported real estate money laundering cases in the U.S., United Kingdom and Canada, Global Financial Integrity says the U.S. has become a preferred destination for those looking to use real estate to stash illicit funds — making it a “Kleptocrat’s dream.”

Public officials and their associates, known as “*politically exposed persons*”, were involved in more than half of the U.S. cases that GFI reviewed. Those PEPs include Genaro García Luna, a former Mexican security minister who bought millions of dollars of U.S. property while accused of taking bribes from the Sinaloa cartel, and the stepson of former Malaysian Prime Minister Najib Razak, who was arrested in 2019 for his alleged role in the 1MDB scandal.

“[Real estate] provides a really easy way to hide ill-gotten gains with little oversight and few questions asked,” GFI policy director Lakshmi Kumar told the International Consortium of Investigative Journalists. “If you’re a criminal, why would you not choose a method that allows you to flaunt your wealth openly, but also hide its illicit nature?”

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1 The U.S. was once considered at the regulatory forefront when it came to preventing money  
2 laundering through real estate, adding “persons involved in real estate closings and settlements” to  
3 the Bank Secrecy Act’s definition of financial institutions in 1988. But over time, Kumar says, the  
4 country lost ground to its peers in the U.K. and Europe.

5  
6 “This is clearly a systemic issue globally,” Kumar said. “Everyone’s discovering how easy it is to  
7 use and abuse the real estate sector. The difference is that everyone else seems to have charted a  
8 path forward. They have put in legislation they’re trying to figure it out. In the U.S., we’re still held  
9 back.”  
10

11  
12 One of the biggest issues that the report cites is the use of geographic targeting orders as the U.S.’s  
13 primary tool to identify potential money laundering events. GTOs impose reporting requirements on  
14 real estate purchases, but only in narrowly targeted scenarios — large cash purchases by legal  
15 entities in specific geographic areas.  
16

17  
18 More than 60% of the U.S. cases examined in the report involved properties in at least one county  
19 not covered by a targeting order, which GFI says highlights the inadequacy of the system.  
20

21 “A lot of the money laundering cases we saw reported in the U.K. and Canada were really  
22 concentrated in what you’d call real estate hubs in the country,” Kumar said. “In the U.S., that was  
23 not the case. It was spread far and wide.”  
24

25  
26 Another concern the report outlines is that the U.S. anti-money laundering regime is focused on  
27 residential purchases, when a significant portion of the cases GFI reviewed involve commercial real  
28 estate transactions.

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2 The FinCEN Files, an investigation on global dirty money flows by ICIJ and BuzzFeed News,  
3 examined the impact of large-scale money laundering on middle America.

4  
5 ICIJ found that Ukrainian oligarch Ihor Kolomoisky, whose case is cited in GFI's report, amassed a  
6 Midwest real estate empire with his associates, at one time becoming Cleveland's largest  
7 commercial landlords, and leaving behind a trail of unpaid property taxes, unemployed workers and  
8 dangerous factory conditions. Kolomoisky has since been sanctioned by the U.S. State Department.  
9

10  
11 Kumar said that because commercial deals often involve several parties and complex financing  
12 arrangements, they are an easy way to stash illicit money.

13  
14 "When you talk about residential real estate, the heart of it is identifying who is the beneficial  
15 owner, [because] if you find out who the beneficial owner is, it also tells you who the criminal is,"  
16 Kumar told ICIJ. "In a commercial real estate investment, you don't have to own the majority stake  
17 to be a criminal. You can own 2% of a \$500 million property, and you are [still] laundering millions  
18 through it."  
19

20  
21 The report also delves into the involvement of "gatekeepers" in real estate transactions and the  
22 direct role of real estate agents, lawyers and accountants in facilitating illicit transactions. But GFI  
23 also points to regulating private investment advisers as a more under-the-radar way of tackling real  
24 estate money laundering.  
25

26  
27 "Investment vehicles are one of the key methods in which to invest in commercial real estate in this  
28 country," Kumar said. "And private equity, venture capital [and] hedge funds have no [anti-money



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1 laundering] requirements — so that becomes a black box, because you don't know who is bringing  
2 what money into this country and how.”

3  
4 The report proposes major overhauls to the U.S.'s anti-money laundering program to fill these gaps,  
5 including replacing GTOs with more stringent reporting requirements on real estate transactions  
6 across the country, robust implementation of the beneficial ownership registry passed this year as  
7 part of the Corporate Transparency Act, and urging the U.S. Treasury to issue specific regulations  
8 regarding purchases by foreign PEPs.  
9

10  
11 The authors of this report confronted federal regulator s, and Elon Musk's staff, with the fact that  
12 Musk was money laundering via the vast number of mansions he had accrued. Musk then put all of  
13 the mansions up for sale and “moved” to Texas where he thought the law might not get him. He was  
14 wrong!

15  
16  
17 Take a look at the massive number of real estate and art collection ownerships that Dianne  
18 Feinstein, Kamala Harris, Elon Musk, Nancy Pelosi...and the rest (and their families) have accrued  
19 to money launder their gains.  
20

21 -----  
22  
23 **From another report on this matter:**  
24

25 *“...A group of domestic citizens filed FBI complaints and lawsuits against The President of*  
26 *the United States and his senior staff along with a lawsuit against a rogue off-shoot of the CIA*  
27 *called "In-Q-Tel". These citizens instigated Congressional corruption investigations and hearings*  
28

1 against the most senior members of the State and Federal government. These actions resulted in the  
2 termination of very famous public officials and their crony criminal embezzlement scams and  
3 almost resulted in the President being forced to leave office, mid-term, based on revelations of a  
4 massive crony kick-back scheme which began to be exposed after the FBI raid of Solyndra. The  
5 director of the FBI was fired for assisting in cover-ups related to this matter.

6 This natural-born American domestic group of engineers was attacked with a \$30 million  
7 dollar+ retribution/political reprisal program contracted by White House political operatives, and  
8 their appointees, who were also the business competitors of the engineers. The attackers used  
9 Fusion GPS-type character assassination smear campaigns (operated by their cronies at Google,  
10 Gawker, Gizmodo, Jalopnik and Facebook), NVCA black-listing, Solyndra-laundering, stone-  
11 walling, Lois Lerner-class agency manipulation and search engine rigging. In-Q-Tel turns out to be  
12 the only federally financed "charity" whose staff are also employed by each of the suspects in this  
13 case and who financed the suspects in this case. It was revealed that White House executives  
14 ordered government agencies to harm members of the public and to reprisal with-hold public  
15 resources from the public. This was a violation of tort, RICO and anti-trust laws.

16 The victims fought back.

17 With the encouragement of members of Congress they used 100% legal tools to interdict the  
18 corruption.

19 Essentially; they helped the United States government sue itself!

20 First, with a unique new kind of pioneering federal lawsuit, victims established — FOR THE  
21 FIRST TIME IN LEGAL HISTORY — that political cronyism is a valid basis for a claim of  
22 arbitrary-and-capricious agency action under the Administrative Procedure Act. See: Federal Case  
23 One, (D.D.C. 2015).

24 Second, they prevailed in the United States Court of Appeals for the District of Columbia  
25 Circuit on their appeal of the district court's ruling that an agency may escape judicial review of its  
26 action by requesting a voluntary remand but refusing to reconsider its initial denial of an  
27 application. See: Case Federal Two, (D.C. Cir. 2017). The Washington DC Circuit agreed with the  
28 victims that an agency may only seek a remand if it promises to reconsider its initial decision. It is

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1 because of that victory that the government, under court order is now re-doing the victims  
2 applications and GAO, FBI, IG's and Congressional oversight offices are watching to assure  
3 effective ethics and transparency. Third, these cases placed, on permanent public record, one of the  
4 most detailed documentation sets, ever assembled, about how modern political "Dark Money"  
5 conduits operate. The legal team hired ex-FBI, CIA and SEC experts to track down covert bank  
6 accounts, revolving door bribes, insider stock trades and other payola between the victim's  
7 competitors and public officials. This documentation now prevents the use of those kinds of criminal  
8 efforts, in the future, by exposing their tactics to the public.

9 Fourth, the victim's team engaged in the interdiction and termination of corrupt agency  
10 executives, contractors and their financiers. This included some of the most well-known names in  
11 Washington, DC, at the time. Many of them were, and are still being, investigated and surveilled by  
12 the FBI, GAO, SEC and Congress.

13 Fifth, and most important, the effort put every corrupt political scheme on notice that they  
14 WILL be found out and interdicted!

15 The bottom line?

16 The victims group WON on every single aspect of their public-interest goals but still have  
17 yet to be recompensed for their damages!

18 Now the "bad guys" have less options to engage in the corruption of our Democracy! “  
19

20 =====

## 21 From Yet Another Overview Of The Matter:

22 “ Victim and his co-workers witnessed officials stealing money from both, their company  
23 and the US Government Treasury. They reported it to the cops. It turned out to be part of one of the  
24 biggest embezzlement crimes ever exposed. Major political figures and tech "bosses" turned out to  
25 be running a "PayPal Tech Mafia". The bad guys then began hunting down and attacking whistle-  
26 blowers in reprisal "for the rest of our lives" per their threats and their ongoing retribution  
27  
28

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1 vendettas.

2       *It was found that famous senators, their Silicon Valley oligarch financiers and their*  
3 *associates run an organized crime insider trading scam that abuses taxpayers and sabotages*  
4 *competing businesses. The terminations of the heads of the FBI, The U.S. Government and other*  
5 *famous people in politics is because of their operation, and cover-ups, of this case. The cover-ups*  
6 *are still going on. Victim's ability to get justice in this matter is still blockaded.*

7       *Hundreds of the perpetrators have already been fired, placed under permanent public*  
8 *surveillance, financially tracked through every asset, reported to federal agencies and targeted for*  
9 *investigation.*

10       *This is a large part of all of that "political corruption" and "dirty Dark Money" politics you*  
11 *read about in the newspaper every day.*

12       *The goal is to interdict every single person, company and political operative group who is*  
13 *engaging in these crimes using crowd-sourced investigation and intelligence tools. “*

**EXHIBIT 29 – The Crony Insider Political Payola**

Cronyism is still prevalent in the energy sector, and the government allocates special benefits to the well-connected instead of fostering a playing field that provides opportunity for all to compete. Nancy Pelosi, Kamala Harris, Dianne Feinstein and Jerry Brown had stock market and revolving door job benefits from the Cleantech Crash Department of Energy funds "winners" and helped to sabotage the competitors of their friends that got handed Crony Cash. Forensic FBI-class accounting proves this! These people were supposed to be Plaintiffs leaders but they chose to cheat rather than compete!

Corruption cannot be fixed in America until it is illegal for ANY politician, or their family members, to own stock market stocks!

The Department of Energy's crony-exclusive subsidies obstruct the long-term success and viability of the technologies and energy sources that they are intended to promote by distorting the actual costs of energy production and interfering with the price signals by which businesses monitor supply and demand. This is clearly covered in the feature films: "*Too Big To Fail*" and "*Omerta*".

In order to keep competitors (of the California Senator's friends) from getting access to the funding, White House and Department of Energy (GOVT) goons, under Secretary of Energy Steven Chu, resorted to the following vendetta and blockade tactics:

- Plaintiffs were first-to-file GOVT applications. Plaintiffs had been invited by the government to participate. GOVT refused to follow the "*First Come, First Served*" rule of the Section 136 funding law and moved those Applicant's who had their act together, to the back of the line when it was discovered that they were ahead of Tesla and Fisker, who had lackadaisically not even filed applications. Tesla and Fisker knew they were going to just be handed the funds, without review, based on White House insider say-so. GOVT then arbitrarily published an illegal rule change press release saying that the "First-Come, First-Served" rule was suddenly no longer in effect after GOVT realized that insider Tesla and Fisker had not had their acts together and that their competitors had filed first and could get money ahead of White House favorites Fisker and Tesla.

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1 Micheal Carr, one of the authors of the 136 Bill, personally told Plaintiffs, in his  
2 Washington DC office, that Tesla and Fisker were not intending to even submit applications  
3 because funding was “in the bag” for them. Washington DC research firm: Eye On Washington,  
4 spoke with Dianne Feinstein’s Chief Of Staff, who threatened them and Plaintiffs over the Fremont  
5 California NUMMI factory. The Plaintiffs were the first party to approach the NUMMI factory  
6 owners to take over the factory. Elon Musk had already gone on the news to say that the “NUMMI  
7 factory had no value to Tesla”.

8 Feinstein then talked Musk into back-tracking and taking the building because her husband  
9 ran CBRE realty which had interests in that and the Solyndra property (later raided by the FBI) next  
10 door. Her relative: Herb Newman, got the HR work and a construction contractor with Feinstein  
11 family connections got construction work. Some of her staff then went to work for Tesla.  
12 Feinstein’s daughter used to stay at Plaintiffs home and had often complained about her mother’s  
13 ethics in recorded get-togethers. Her best friend lived with Plaintiffs and her mother worked at the  
14 Feinstein office. The 60 Minutes “Cleantech Crash” episode reveals that most of the Plaintiffs  
15 technologies were acquired by China and forced ultra-cheap rates and Chinese spies have been  
16 found to be working for the Feinstein’s. Tesla’s China deal was facilitated by Feinstein  
17 intermediaries. Feinstein’s hubby’s business partner: Mart Bailey, is China’s top deal maker. China  
18 is considered, by the Pentagon, to be America’s biggest current global adversary.

19 - Once an applicant applied for GOVT funds, they were locked out of all other bank or  
20 venture funding worldwide, by design. The National Venture Capital Association and major banks  
21 cooperated with this scheme. No other funding outlet could match the GOVT finance rate, so  
22 nobody would fund an applicant until AFTER an applicant had been funded... but GOVT would  
23 not fund any applicants except the 5 companies who paid the biggest bribes, and made the largest  
24 campaign PAC payments, to the Obama campaign. The GOVT funds were a catch-22 to make sure  
25 that indie tech companies could NOT get funded unless they were crony insiders.

26 - GOVT "bottom-drawered" outsiders, especially the Plaintiffs, applications and stuck them  
27 at the bottom of a file cabinet, in Lachlan Seward's GOVT office, for months without even looking  
28 at them in order to run-out-the-clock on those who competed with campaign-finance front facades:

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1 Tesla and Fisker. Tesla and Fisker had agreed to take the taxpayer money, stuff it in their company  
2 account, then move it to PAC's who then moved it to Obama, Feinstein, Harris and Pelosi political  
3 election campaigns. That process is called "Dark Money Obfuscation". When the New York Mafia  
4 did it they got put in prison. When Elon Musk does it, he gets more free taxpayer cash.

5 - GOVT told Plaintiffs, that competed with Tesla, that GOVT would not approve the loan  
6 for their 100% electric car because the applicant's car "***DID NOT USE ENOUGH GASOLINE***"...!  
7 or that an applicant "was not going to make enough cars from the outset"..when it is widely known  
8 that any manufacturing effort requires a ramp-up curve.

9 - Every, so called, 'GOVT reviewer' of the GOVT applications was either a direct competitor  
10 of the Plaintiffs or had stock market holdings in Tesla, Fisker, Solyndra, etc. or later went to work  
11 for them. The review process was the most rigged, crony deal anyone had ever seen in Washington  
12 DC.

13 - Insider (and bribe paying) Tesla Motors had hundreds of meetings and phone calls with  
14 GOVT staff, many at GOVT HQ, in order to hand-walk Tesla through the process and babysit their  
15 application on orders from the Obama White House. Competing applicants received no phone calls,  
16 no meetings and no help. GOVT's Carol Battershal, refused to return most phone calls from  
17 applicants who were in competition with Tesla because she was a "*Tesla Fan Girl*".

18 - GOVT lawyer Cohen, refused to respond to any questions from applicants competing with  
19 Tesla, yet spent many hours helping Tesla get their paperwork configured. He was terminated for  
20 conflict issues.

21 - Oval Office White House car czar: Steven Rattner, refused to assist or respond to any  
22 applicants and told a number of members of Congress that he was just focused on trading "votes-  
23 for-GOVT-funds with Detroit auto unions". He said that small electric car start-ups "don't offer  
24 enough vote trades to make a discussion valuable". ***Rattner was later indicted in New York for***  
25 ***Stock market fraud***. His indictment provided key initial clues that the entire Cleantech "green  
26 energy" program was about pumping stock market holdings that GOVT and White House insiders  
27 exclusively controlled for their own profiteering.

28 - The GOVT was so overt in their industrial monopoly operations and sabotage efforts that

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1 Tesla's own marketing boss wrote an article about it because they were so obvious in their  
2 manipulations of an industry: <https://www.wired.com/2009/12/GOVT-loans-stifle-innovation/>

3 - GOVT never once called, or returned calls from CEO's of the companies applying. GOVT  
4 particularly refused to talk to Plaintiffs because all of Plaintiffs technology obsoleted all of Tesla's  
5 business model and technologies.

6 - One of the White House staff that communicated between agencies was caught taking  
7 pictures up girls skirts and his case was reduced because of White House intervention. Barack  
8 Obama later became part of NETFLIX and helped bring the notorious pedo film "Cuties" to the  
9 screen. Sex trades between White House staff, GOVT staff and lobbyists had become common-  
10 place by 2010.

11 - Applicant Bright Automotive famously published a nationwide open letter confirming all  
12 of these crimes and abuses by GOVT

13 - ZAP Motors, Elio Motors, Brammo and almost every other applicant confirmed these  
14 charges.

15 - The GAO, Congress and yet-to-be-seen FBI documents and NSA recordings confirm all of  
16 these assertions.

17 - Plaintiffs hand delivered more written customer order letters to Congress and GOVT in  
18 Washington DC than ALL of the other applicant's combined yet Lachlan Seward at GOVT "lost  
19 them" (like Lois Lerner lost her IRS hard drives). The applicants re-sent them, yet the GOVT office  
20 refused to review them or contact the customers that had submitted them because they proved that  
21 Tesla was faking customer order volume and other applicants were not.

22 - GOVT staff Matt Rogers, Steve Spinner and other Steven Chu buddies, who were  
23 manipulated into GOVT jobs by McKinsey/Covington and Burling, flew back and forth to  
24 California, on the taxpayers dime, to go to parties and baseball games each weekend, yet GOVT  
25 could not find the time or resources for any in-person meetings with anyone but insider Tesla  
26 Motors. They were reported-on by green energy CEO Gary D. Conley. Conley was later found with  
27 a bullet in his head behind Beale Air Force base in Northern California. Conley had written and  
28 talked to a number of applicants stating that a major Silicon Valley crime mob was "after him".



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1 Kamala Harris refused to investigate the matter when she was the Attorney General of California.  
2 Harris is financed by the Silicon Valley oligarchs suspected of being complicit in the deaths of  
3 Conley, Rajeev Motwani, Seth Rich and others.

4 - Applicant WITNESS Vehicles had applied for a loan under the GOVT "LGP" program.  
5 GOVT wanted a cash payment of many tens of thousands of dollars from them in order to look at  
6 that application. GOVT told WITNESS that "GOVT does not have an application form so just make  
7 up your own". WITNESS acquired an investor to fund the "review payment", which GOVT  
8 maintained was not a bribe. Tesla Motors was not required to make such a payment in advance of  
9 review. Tesla only had to make the payment later, after other applicant's complained that Tesla was  
10 getting "crony insider favors". Secretary of Energy Steven Chu's top man had committed, in a  
11 recorded call, to speak to WITNESS's outside investor's in one phone call, per the request of  
12 WITNESS's investors to confirm that the money was being used as a GOVT fee. The GOVT  
13 official refused to return all calls, emails, FEDEX letters and personal messenger requests to  
14 respond. He was recorded in conversations in the next room while his secretary said he was "not in  
15 the building" and also when he told his secretary to "hang up" on the callers. The investors had  
16 become concerned that the promised reply from GOVT was being blocked. After a massive number  
17 of attempts, a few minutes after the deadline to pay the "review fee" had passed, the senior official  
18 at GOVT finally responded with a communication. He sent an email stating that WITNESS had  
19 missed the deadline and was not eligible to apply. He had specifically and overtly sabotaged  
20 WITNESS by not giving the one sentence response to WITNESS's investors, ever!, and then  
21 waiting until the moment the deadline passed to say "HA, we f\*cked you!" In a recorded conference  
22 call and Congressional meetings, Steven Chu had offered to waive the fee, as GOVT had set a  
23 precedent of doing for this with other, applicants. WITNESS, which beat every other applicant on  
24 comparative metrics, lost millions of dollars because of the lies and machinations of GOVT.

25 - Steven Chu's buddies at McKinsey Consulting flooded Congress and the White House with  
26 "helpful" "White Papers" that all seemed to reach the ironically similar conclusion that only Tesla  
27 Motors could be the "green company" that could solve "green energy". [Raj Gupta Went to jail for](#)  
28 [rigging McKinsey](#) and ( <https://www.indiawest.com/blogs/former-mckinsey-ceo-rajat-gupta-s-10->

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1 [tall-claims-short-shrifted/article\\_e7e88b8c-9c58-11e9-9d18-03143accc78a.html](https://tall-claims-short-shrifted/article_e7e88b8c-9c58-11e9-9d18-03143accc78a.html) ) stock market  
2 manipulations. The Silicon Valley oligarchs had hired all of McKinsey to push this narrative that  
3 would only hype Tesla stock. McKinsey pushed lithium mining and lithium batteries like there was  
4 no tomorrow. Google and Goldman Sachs held massive assets in lithium mining.

5 - GOVT "Tesla Fan Boys" made up their own interpretations of applicants statements and  
6 re-wrote applicants intentions in order to create negative data for competitors of Tesla and make  
7 Tesla look better even though Tesla was: 1.) about to go bankrupt, 2.) bleeding cash, 3.) owner of  
8 the absolute worse debt ratio of any applicant, 4.) Trying to build new buildings, like Solyndra (for  
9 real estate holdings to benefit CBRE, Feinstein's husband's company), 5.) bleeding staff, 6.)  
10 operated by a sociopath drug abuser, 7.) reliant on Afghanistan war-based lithium battery mines that  
11 may never materialize, 8.) reliant on Congo cobalt mines that used child slave labor, 9.) reliant on  
12 Panasonic lithium batteries that were never intended for auto energy storage and widely  
13 documented to explode and release poison cancer-causing gas during fires, 10.) off budget PER  
14 CAR by over \$100,000.00 PER CAR, 11.) in a legal dispute with all of it's founders, 12.) fully  
15 conflicted with stock ownership by GOVT, White House and Senate executives, and much, much  
16 more...The FBI and SEC have been provided with a list of nearly 1000 lies, deceptive actions,  
17 safety cover-ups, stock manipulations in association with Google owners, sex abuse issues, racism  
18 and frauds by Tesla Motors and Elon Musk.

19 - Department of Energy staff use lies, Lois Lerner-type manipulations, sabotage, third-party  
20 contracted media hit-jobs (operated by Fusion GPS, Gizmodo, Media Matters, Google, etc.), stone-  
21 walling and other dirty tricks tactics known as "Ratf\*ucking", to harm and delay funding for any  
22 party who might compete with the crony insiders.

23 There are **thousands** of other hard-evidence case examples of the corruption in this case.

24 White House Staff including Rahm Emanuel, Bill Daley, Jay Carney, Robert Gibbs, Steve  
25 Rattner, David Axelrod, John Podesta, et al; and The Secretary of Energy Steven Chu and the Chief  
26 Counsel for the United States Department of Energy Daniel Cohen and Bill Cooper were, (from  
27 2007 forward), either financed by, friends, with, sleeping with, dating the staff of, holding stock  
28 market assets in, promised a revolving door job or government service contracts from, partying

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1 with, personal friends with, photographed at private events with, exchanging emails with, business  
2 associates of or directed by; applicant's business adversaries, or the Senators and Department of  
3 Energy politicians that those business adversaries pay campaign finances to, or supply political  
4 digital search manipulation services to.

5 Criminal U.S. Senators coordinated and profited in these schemes. Their own family  
6 members have now supplied evidence against them. The facts prove that nobody is allowed to "win"  
7 government funds unless they are friends and stock market partners with certain U.S. Senators.

8 Even if your GOVT application metrics beat every single other competing Applicant, you  
9 will get lied to and defrauded by Department of Energy and White House officials. You will be told  
10 that you have a "fair chance", **but** all of the money is secretly hard-wired to a business partner of a  
11 Pelosi or Feinstein and you will just waste your time, staff resources and payroll waiting for years  
12 on promised funds that will never come.

13 The awful truth is that Plaintiffs were **DEFRAUDED** out of their life savings, their  
14 investors savings and years of their lives by The U.S. Government . The feds knew that the money  
15 was hard-wired to Fisker, Tesla and the crony insiders but they induced the other applicants to apply  
16 under false pretenses. They used the outsider applicants as a cover-up for their pass-through crony  
17 payola schemes to pay off Silicon Valley tech oligarchs for funding the Obama and Pelosi political  
18 campaigns and internet search rigging.

19 The White House, at the time, and The U.S. Government engaged in **FELONY**,  
20 **ORGANIZED CRIME** payola, worked with Jeffrey Epstein and his gang and operated massive  
21 stock market manipulation. The highest levels of law enforcement, including Eric Holder and James  
22 Comey, helped cover it up! Joe Biden's son has now been exposed running the same type of  
23 shenanigans with sketchy off-shore companies.

24 When the government plays favorites, valuable resources shift to less productive uses.

25 Removing the cronyism and corporate welfare that are pervasive in energy markets is no  
26 easy feat. The current administration's attempt to rescind unused funds in the U.S. Department of  
27 Energy Advanced Technology Vehicles Manufacturing loan program provides a good case study.

28 In handing out only five crony loans, the program has wasted taxpayer dollars by

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1 subsidizing economic losers (Fisker) and has promoted corporate welfare by subsidizing well-off  
2 companies (Nissan and Ford). Tesla Motors was clearly awarded government funds based on bribes  
3 and cover-ups of its failed finances and deadly engineering defects. Additionally, Tesla acts as a  
4 campaign funding conduit to Nancy Pelosi and Dianne Feinstein's election drives. The program has  
5 \$4.3 billion remaining but has been idle for more than eight years without a new loan administered  
6 by the department because the FBI is hot on the trail of this scheme. Funds still left in that account  
7 should be given to the Plaintiffs who were the victims of this failed crony payola Cleantech Crash  
8 political payola scheme.

9       The Congressional Budget and Impoundment Control Act of 1974 authorizes the President  
10 to rescind funding previously enacted into law, and the White House appropriately offered a \$15  
11 billion rescissions package that included the Advanced Technology Vehicles Manufacturing loan  
12 program. The government owes the defrauded applicants their damages and that money should  
13 come from the \$4.3 billion still sitting around at GOVT. The White should take the \$1.5 Billion out  
14 of the fund and provide it to these Plaintiffs.

15       The Pelosi Special Interests have, so far, prevailed, and the program remains in place. The  
16 money is just sitting there. A DOJ lawsuit is needed to expose the scam and shut down these crimes  
17 against the public. In the mean time, that money must be used to compensate those harmed,  
18 damaged, sabotaged and defrauded by GOVT. No company will ever get that money again without  
19 a global crowd-sourced public FBI-class investigation being conducted against them. That money,  
20 must, therefore, be used to make up for the quantified past crimes and harms against the non-crony  
21 Applicant's!

22       Thus, the State of California and The Agencies Of The U.S. Government should consider  
23 Plaintiffs demand. It is a legal '**Demand For Payment**' and the collection proceedings are in  
24 process!

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## **EXHIBIT 29 - McKinsey's Fake White-papers, Designed To Pitch The Scam, Were Contracted By Defendants**

McKinsey & Company staffed The White House and The senior executives at the U.S. Department of Energy for the “Cleantech Crash”. All the insiders were McKinsey insiders who worked for the government AND AGAINST THE PUBLIC and for their insider friends. McKinsey was hired by the Silicon Valley VC Cartel to flood Congress and political circles with a tsunami of white-papers and talks saying that lithium ion batteries were the only thing that could solve their “Climate Crisis”.... Except McKinsey was hired by the battery owners. You might wonder where you heard the name “McKinsey”. McKinsey loves monopolistic world-scope corporate crime smoke-screens.

Since 2008, McKinsey & Company has regularly advised the Food and Drug Administration's drug-regulation division, according to agency records. The consulting giant has had its hand in a range of important FDA projects, from revamping drug-approval processes to implementing new tools for monitoring the pharmaceutical industry.

During that same decade-plus span, as emerged in 2019, McKinsey counted among its clients many of the country's biggest drug companies — not least those responsible for making, distributing and selling the opioids that have ravaged communities across the United States, such as Purdue Pharma and Johnson & Johnson. At times, McKinsey consultants helped those drugmaker clients fend off costly FDA oversight — even as McKinsey colleagues assigned to the FDA were working to bolster the agency's regulation of the pharmaceutical market. In one instance, for example, McKinsey consultants helped Purdue and other opioid producers push the FDA to water down a proposed opioid-safety program. The opioid producer ultimately succeeded in weakening the program, even as overdose deaths mounted nationwide.

Yet McKinsey, which is famously secretive about its clientele, never disclosed its pharmaceutical company clients to the FDA, according to the agency. This year ProPublica submitted a Freedom of Information Act request to the FDA seeking records showing that

McKinsey had disclosed possible conflicts of interest to the agency's drug-regulation division as part of contracts spanning more than a decade and worth tens of millions of dollars. The agency responded recently that "after a diligent search of our files, we were unable to locate any records responsive to your request."

[Federal procurement rules](#) require U.S. government agencies to determine whether a contractor has any conflicts of interest. If serious enough, a conflict can disqualify the contractor from working on a given project. McKinsey's contracts with the FDA, which ProPublica obtained after filing a FOIA lawsuit, contained [a standard provision](#) obligating the firm to disclose to agency officials any possible organizational conflicts. One passage reads: "the Contractor agrees it shall make an immediate and full disclosure, in writing, to the Contracting Officer of any potential or actual organizational conflict of interest or the existence of any facts that may cause a reasonably prudent person to question the contractor's impartiality because of the appearance or existence of bias."

Agency officials rely on disclosure to ensure that they have the information they need to consider whether a contractor's other business relationships risk slanting its judgment. "Contractors have the obligation to disclose potential conflicts, and then the government has an obligation to figure out how to deal with it," said Jessica Tillipman, an assistant dean and government procurement law expert at George Washington University Law School.

Asked for comment, McKinsey did not assert that it disclosed potential conflicts to the FDA. But a spokesperson for the firm, Neil Grace, nonetheless maintained that "across more than a decade of service to the FDA, we have been fully transparent that we serve pharmaceutical and medical device companies. McKinsey's work with the FDA helped improve the agency's effectiveness through organizational, resourcing, business process, operational, digital, and technology improvements. To achieve its mission, the government regularly seeks support from additional experts who understand both the government's mission and the industries' practices. We take seriously our commitment to avoid conflicts and to serve the best interests of the FDA." (McKinsey is a sponsor of ProPublica's local virtual events programming.)

McKinsey's failure to disclose its industry engagements deprived the FDA of the

1 opportunity to consider whether, for example, the overlap between McKinsey's government and  
2 pharmaceutical industry projects and the potential financial incentives at play constituted a conflict,  
3 experts said.

4 "For a contractor like McKinsey not to disclose the companies it is working for has all the  
5 appeal of the Addams Family on Halloween hiding Uncle Fester in the basement so as not to scare  
6 the neighborhood," said Charles Tiefer, a professor of government contracting at the University of  
7 Baltimore Law School.

8 An FDA spokesperson, Shannon Hatch, said: "The FDA's procurement activities are  
9 governed by the Federal Acquisition Regulations (FAR). The agency takes our role awarding  
10 contracts seriously and we work to ensure the agency maintains high standards of integrity as set  
11 forth in the FAR."

12 McKinsey's extensive opioid company consulting eventually began coming to light, starting  
13 with [a 2019 ProPublica report](#). The firm's opioid work has provoked widespread criticism, spawned  
14 a welter of lawsuits and led the firm to pay nearly \$600 million this year to settle legal claims made  
15 by all 50 states, as well as five U.S. territories and the District of Columbia. It also prompted  
16 McKinsey to issue a [statement](#) in which the firm acknowledged that it "fell short" of its standards in  
17 advising opioid makers while also denying that it "sought to increase overdoses or misuse and  
18 worsen a public health crisis." The firm pledged not to work on opioid-related projects going  
19 forward.

20 The lawsuits and [public outrage](#) have focused on the consulting firm's efforts to help  
21 increase (or "turbocharge," in McKinsey's parlance) sales of Purdue Pharma's highly addictive  
22 flagship opioid, OxyContin. But lately, concerns have begun to emerge about McKinsey's parallel  
23 assignments, which were worth upward of \$50 million over about 12 years, for the nation's primary  
24 drug regulator. [In a letter](#) to the FDA in August, a bipartisan group of senators led by [Sen. Maggie](#)  
25 [Hassan, D-N.H.](#), asked the regulator to address "potential conflicts of interest that may have arisen"  
26 from McKinsey's work for both the agency and "a wide range of actors in the opioid industry,  
27 including many of the companies that played a pivotal role in fueling the opioid epidemic that our  
28 country now faces."

1 McKinsey, which has focused on counseling the CEOs of leading corporations for much of  
2 its nearly 100-year history, began expanding its public-sector practice in the United States around  
3 the time of its earliest FDA projects. McKinsey prides itself on its ability to act quickly and with  
4 discretion, and in its largely unregulated engagements for corporate clients, there are few  
5 impediments to the firm doing so.

6 In government consulting, however, the rules are far more stringent, and on several recent  
7 occasions, the firm has been caught [refusing to abide by such strictures](#), including disclosure rules.  
8 Over the past couple of years, for example, McKinsey's bankruptcy-advisory practice has paid more  
9 than \$30 million to the Justice Department and one client's creditors to settle allegations that it  
10 failed to disclose potential conflicts, as required by the federal bankruptcy rules. Those allegations  
11 also [prompted a federal criminal investigation](#) of the firm. McKinsey has denied wrongdoing, and  
12 the investigation, which came to light in 2019, has not led to charges.

13 There are signs of overlap between McKinsey's government and industry engagements,  
14 though publicly available information about the firm's work for drug companies is limited. In one  
15 instance in 2008, which surfaced in a lawsuit against Purdue, the FDA told Purdue that it planned to  
16 require the company to submit a drug-safety plan for its bestselling drug, OxyContin. The company  
17 recognized that regulation of this sort threatened to cut into its sales margins, and according to  
18 McKinsey documents [filed in federal court](#), top Purdue executives tasked the consultancy with  
19 devising a response to the FDA.

20 According to [McKinsey PowerPoint slides](#), the firm proposed four options, among them  
21 suing the FDA to "delay" the imposition of a safety plan and to "band together" with other opioid  
22 producers to "formulate arguments to defend against strict treatment by the FDA." Purdue selected  
23 the latter, with McKinsey helping to implement the strategy. In 2009, McKinsey emails and slides  
24 show, its consultants prepared Purdue executives for at least two meetings with FDA officials. (One  
25 suggested answer to questions about who at Purdue would take personal responsibility for  
26 OxyContin overdoses: "We all feel responsible.")

27 In the meantime, according to [a 2011 FDA contract](#), the agency's drug-regulation division  
28 hired McKinsey to develop a "new operating model" for the office responsible for developing drug-



1 safety plans of the sort Purdue and its allies were fighting against, with the consultancy's help.  
2 Among McKinsey's tasks were defining the office's "strategic goals and objectives," including its  
3 "role in monitoring drug safety."

4 In 2012, the FDA issued a substantially watered-down version of the opioid-safety plan.

5 There's no evidence to suggest McKinsey's consultants at the FDA influenced the opioid-  
6 safety plan. But this apparent overlap between a government contract and an assignment for a  
7 commercial client reflects the type of issue an agency would want to consider when assessing  
8 whether a potential conflict of interest exists. Agencies are likeliest to identify a conflict "where an  
9 outside business venture is related directly to the subject matter of the procurement and structured  
10 such that there is a real economic incentive for biased performance," Keith Szeliga, a partner at the  
11 law firm Sheppard Mullin, [wrote in a 2006 article](#) in the Public Contract Law Journal.

12 A number of other McKinsey projects at the FDA, contracting records show, were also  
13 likely to have a financial impact on its pharmaceutical industry clients. In 2010, for example, the  
14 FDA hired the firm to help it develop a system to track and trace the distribution of potentially  
15 harmful prescription drugs. The [contract](#) required the firm to consult with "supply chain  
16 stakeholders," a category that potentially included a number of long-standing McKinsey clients.  
17 Hassan and her fellow senators, in their recent letter to the FDA, called this "an obvious conflict of  
18 interest."

19 [\*\*How McKinsey Is Making \\$100 Million \(and Counting\) Advising on the Government's\*\*](#)  
20 [\*\*Bumbling Coronavirus Response\*\*](#)

21 [Another contract](#), from 2014, tasked McKinsey with assessing the "strengths, limitations and  
22 appropriate use" of Sentinel, a system meant to monitor the safety of drugs once they're on the  
23 market. That project likewise called for McKinsey to interview "external stakeholders," including  
24 "industry organizations" and "drug and device industry leaders."

25 The news of McKinsey's opioid work apparently did little to dampen the FDA's enthusiasm  
26 for the consultancy. In March 2019, just after the news broke, the agency signed a new contract  
27 with McKinsey — extending the firm's multiyear effort to help the FDA "modernize" the process  
28 by which it regulates new drugs. McKinsey is one filthy, lying, shill operation.

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## Here is how the corruption process works:

### [Crony capitalism - Wikipedia](#)

[https://en.wikipedia.org/wiki/Crony\\_capitalism](https://en.wikipedia.org/wiki/Crony_capitalism)

**Crony capitalism** is an economic system in which businesses thrive not as a result of risk, but rather as a return on money amassed through a nexus between a business class and the political class. This is often achieved by using state power rather than competition in managing permits, government grants, tax breaks, or other forms of state intervention over resources where the state exercises ...

### [CRONY CAPITALISM | definition in the Cambridge English ...](#)

<https://dictionary.cambridge.org/us/dictionary/english/crony-capitalism>

**crony capitalism** meaning: an economic system in which family members and friends of government officials and business leaders.... Learn more.

### [What is crony capitalism? definition and meaning ...](#)

[www.businessdictionary.com/definition/crony-capitalism.html](http://www.businessdictionary.com/definition/crony-capitalism.html)

**crony capitalism:** An economy that is nominally free-market, but allows for preferential regulation and other favorable government intervention based on personal relationships. In such a system, the false appearance of "pure" **capitalism** is publicly maintained to preserve the exclusive influence of well-connected individuals.

### [Capitalism Definition - Investopedia](#)

<https://www.investopedia.com/terms/c/capitalism.asp>

**Capitalism** is an economic system in which capital goods are owned by private individuals or businesses. The production of goods and services is based on supply and demand in the general market ...

### [What is Crony Capitalism? | PragerU](https://www.prageru.com/video/what-is-crony-capitalism/)

 <https://www.prageru.com/video/what-is-crony-capitalism/>

In **crony capitalism**, politicians spend the public's money not for the public interest but to reward friends, supporters, or themselves. In **crony capitalism**, government officials use taxpayer dollars to benefit their friends, supporters, or themselves, rather than using that money for the public interest as it is intended. View source

### [Crony-capitalism index - Wikipedia](https://en.wikipedia.org/wiki/Crony-capitalism_index)

 [https://en.wikipedia.org/wiki/Crony-capitalism\\_index](https://en.wikipedia.org/wiki/Crony-capitalism_index)

The **crony-capitalism** index aims to indicate whether the livelihood of the people from certain country or city with a capitalist economy are easily affected by **crony capitalism**. It is not an internationally recognized index due to its limitations. It is a new measurement of **crony capitalism** designed by The Economist newspaper based on the "work by Ruchir Sharma of Morgan Stanley Investment ...

### [Crony Capitalism | Definition of Crony Capitalism by ...](https://www.merriam-webster.com/dictionary/crony%20capitalism)

 [https://www.merriam-webster.com/dictionary/crony capitalism](https://www.merriam-webster.com/dictionary/crony%20capitalism)

**Crony capitalism** definition is - an economic system in which individuals and businesses with political connections and influence are favored (as through tax breaks, grants, and other forms of government assistance) in ways seen as suppressing open competition in a free market. How to use **crony capitalism** in a sentence.

### [Where does Crony Capitalism Come From?](https://investorhour.com/episodes/where-does-crony-capitalism-come-from)

 <https://investorhour.com/episodes/where-does-crony-capitalism-come-from>

Nick Sorrentino is the co-founder of Against **Crony Capitalism** and the editor of AC2NEWS.com. A political and communications consultant whose clients have spanned the political spectrum, his work has been featured at Foreign Policy Magazine, Chief Executive Magazine, Reason.com, NPR.com, TownHall, The Daily Caller, and many other publications.

### [Crony Capitalism in America | Mises Institute](https://mises.org/library/crony-capitalism-america)

 <https://mises.org/library/crony-capitalism-america>

Hunter Lewis. Hunter Lewis is author of twelve books, including *The Secular Saints: And Why Morals Are Not Just Subjective*, *Economics in Three Lessons & One Hundred Economic Laws*, *Where Keynes Went Wrong*, and **Crony Capitalism** in America 2008-2012, and has contributed to the New York Times, the Washington Post, the Times of London, The Atlantic and many other magazines and web sites including ...

[AC2 News - "The Real Problem with the Economy"](#)



<https://www.ac2news.com>

**Crony Capitalism** in America at IndieBound From Us to You Receive additional services from Against **Crony Capitalism** through email: Story updates, action alerts, free ebook, and more

[13 Examples of Crony Capitalism - Simplicable](#)



<https://simplicable.com/en/crony-capitalism>

**Crony capitalism** is a society that allows an elite to profit from government resources in a way that doesn't benefit society. This is typically based on some form of political corruption whereby politicians personally benefit by granting the rent seeking demands of an elite. The following are illustrative examples.

[What is Crony Capitalism? - YouTube](#)



<https://www.youtube.com/watch?v=4DxXHh-p-O4>

This election season there's a lot of talk about corruption, about politicians being "bought and sold", and about "**crony capitalism**". What do those terms mea...

[Crony Capitalism in America: 2008-2012: Lewis, Hunter ...](#)



<https://www.amazon.com/Crony-Capitalism-America-Hunter-Lewis/dp/0988726726>

**Crony Capitalism** is a companion volume to Hunter Lewis' other outstanding work, published at the same time, *Free Prices Now!* --Jeremy Hammond, *Barrons*, 11/2/13 ". . . What we have today is not the free market but '**crony capitalism**,' an altogether different matter.

["Crony Capitalism" | Capitalism.org](#)



<https://www.capitalism.org/collectivism-statism/crony-capitalism/>

"**Crony capitalism**" is a contradiction in terms. **Capitalism** is a political-economic system based on the principle of individual rights, which means the separation of state and economics (just

1 like the separation of church and state). Under **capitalism**, the government's sole purpose is to  
2 protect each individual's rights equally.

3 **Crony Capitalism - University of Chicago Press**

4  <https://www.journals.uchicago.edu/doi/pdfplus/10.1086/686474>

5 **Crony Capitalism** Paul H. Rubin\* This Article discusses "**crony capitalism**," a form of  
6 rent-seeking, and its sources. Although the term **crony capitalism** is generally applied to non-  
7 Western economies, any economy is susceptible to three primary sources of cronyism: stan-dard  
8 special interest legislation, "bootlegger and Baptist"

9  
10  
11 **Bribery, Money Laundering And Hit-Jobs**

12  
13 If you thought that Mossack Fonseca and the Panama Papers was "the story": It was only the  
14 beginning!

15 Silicon valley's politicians make policy that, both, ruins taxpayers while making the  
16 politicians rich by artificially inflating the value of the politicians secret stock market holdings.  
17 Now we have exposed their entire scam!

18 This is about the U.S. Senators and their crony dark money political bribes and criminal  
19 kick-backs, the tech oligarchs who deployed the bribes and the victims of these crimes.

20 Google, Tesla, Facebook, Linkedin and their VC's (and deeply bribed Senators) ordered and  
21 operated hit-jobs on the public and their competitors, supported by the Obama White House and  
22 U.S. Dept. of Energy. The FBI raided their scheme and the investigations tracked all the way back  
23 to the Oval Office!

24 - This is about a group of tech oligarchs, and their corrupt Senators, who commit crimes in  
25 order to manipulate over a trillion tax dollars (YOUR MONEY) into their, and their friends pockets.

26 - They are felons yet they control some of the offices of the agencies who are supposed to  
27 arrest them. Silicon Valley bought K Street and U.S. Senators, gave them more Dark Money than  
28 history has ever seen and then had giant tech-law firms bribe, hit-job and blockade any attempts to

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1 solve the problem.

2 - Some of the largest bribes in American history were paid via billions of dollars of pre-IPO  
3 cleantech stock, insider trading, real estate, Google search engine rigging and shadow-banning, sex  
4 workers, revolving door jobs, nepotism, state-supported black-listing of competitors and under-the-  
5 table cash. Why are these Silicon Valley Oligarchs and their K-Street law firms and lobbyists  
6 immune from the law?

7 U.S. Senators, Agency Heads and Congress were bribed, in this case, with:

8 - Billions of dollars of Google, Twitter, Facebook, Tesla, Netflix and Sony Pictures stock  
9 and stock warrants which is never reported to the FEC

10 - Billions of dollars of Google, Twitter, Facebook, Tesla, Netflix and Sony Pictures search  
11 engine rigging including shadow-banning, de-boosting, DNS re-routing, directed search suggestion,  
12 subliminal messaging bias, and hundreds of other psychological manipulation tricks; the value of  
13 which is never reported to the FEC but proven by invoices and bank payments between Google and  
14 Gawker, Gizmodo, DNC, Fusion GPS, Black Cube, etc.

15 - Free rent

16 - Prostitutes and Rent Boys

17 - Cars

18 - Dinners

19 - Party Financing

20 - Sports Event Tickets

21 - Campaign Services "Donations"

22 - Secret PAC Financing

23 - Jobs in Corporations in Silicon Valley For The Family Members of Those Who Take  
24 Bribes And Those Who Take Bribes, Themselves

25 - "Consulting" contracts from McKinsey as fronted pay-off gigs

26 - Overpriced "Speaking Engagements" which are really just pay-offs conduited for donors

27 - Private jet rides and use of Government fuel depots (ie: Google handed out NASA jet fuel  
28 to staff)

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- 1 - Real Estate
- 2 - The use of Cayman, Boca Des Tores, Swiss and related laundering accounts
- 3 - The use of HSBC, Wells Fargo and Deustche Bank money laundering accounts
- 4 - Free spam and bulk mailing services owned by corporations
- 5 - Epstein sex ring exploits
- 6 - Use of high tech law firms such as Perkins Coie, Wilson Sonsini, MoFo, Covington &
- 7 Burling, etc. to conduit bribes to officials

8 While our investigators were able to get a law produced that made insider trading less  
9 attractive for Congress, nothing has been done to stop stock warrant bribes and revolving door  
10 payola. Additionally, even with the new law, 60% of the U.S. Congress (including their associates  
11 and families) STILL engage in insider trading because law enforcement has not prosecuted many of  
12 them.

13 This is about a group of U.S. Senators, Silicon Valley Oligarchs, Crooked Law Firms and  
14 Lobbyists who commit crimes in order to manipulate over a trillion tax dollars into their, and their  
15 friends pockets. They use media monopoly tricks to try to shut out any other viewpoints. They push  
16 pretend issues that they believe will get more tax money allocated to "issue solutions" that they, and  
17 their friends, happen to already own the monopolies for. They are felons yet they control some of  
18 the offices of the agencies who are supposed to arrest them. Silicon Valley bought K Street lobby  
19 firms and U.S. Senators, gave them more Dark Money than history has ever seen and then had giant  
20 tech-law firms bribe, hit-job and blockade any attempts to arrest them.

21 There are no "conspiracy theories" here. These are all hard forensic facts that will stand-up  
22 in any court!

23 They did this to anybody who they thought might expose the White House use of agencies  
24 as "slush-funds" and "Dark Money" campaign finance laundering conduits. They were afraid that  
25 exposure of these schemes would cause the President of the United States to be forced to resign in  
26 the middle of his term!

27 The associated case videos and reports provided with this case matter are evidence, signed  
28 by thousands of reporters and investigators, that the suspects are: A.) Based around Silicon Valley

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1 and Washington DC; B.) Operating as a RICO-violating cartel; C.) Deeply sociopath and sexually  
2 disturbed; D.) Money laundering via large law firms and investment banks; E.) Using Google,  
3 Reddit, Facebook, etc. as mass political behavior-manipulation programs; F.) Paying for and  
4 operating character assassination programs against those who defy them; G.) Using "green energy"  
5 as one of their facades to steer tax dollars to the companies that they, and their friends, already own  
6 and work for; H.) Willing to resort to the most extreme things to protect their scheme; I.) Living in  
7 an ideological "echo-chamber" in their tech bubbles; J.) Empowered entirely by the public's lack of  
8 willingness to boycott them and demand their arrests.

9 A vast number of individuals and companies, who are willing to testify about these crimes  
10 have NEVER BEEN ALLOWED into a Congressional hearing, court-room, FBI 302 interview,  
11 etc., because crooked Senators are terrified of the confirming testimony they can all provide.

12 We placed autonomous monitoring applications on a vast number of co-location servers,  
13 shared hosting ISPs, stand-alone servers and sites around the world over ten years ago and  
14 monitored: 1.) Google search results compared to other search engines, 2.) Google DNS and  
15 spoofing activities, 3.) Google results on 100 key search terms including search terms of assets,  
16 candidates and business associates connected to Google, 4.) Where Google sends data from users  
17 clicking on Google supplied links, 5.) Where fabricated mole data that was injected as user data  
18 ultimately ended up later, and other metrics. The results prove that Google abuses the market, the  
19 public, politics and human rights for and with U.S. Senators and public officials.

20 We found that Elon Musk, Larry Page, Sundar Picachu, Eric Schmidt, Jared Cohen and  
21 Sergy Brin at Google and Mark Zuckerberg at Facebook order their company staff to hide, down-  
22 rank, hole-punch the net, shadow-ban, stock market valuation manipulate and exclude this website  
23 on the internet. They do this IN COORDINATION WITH Public Officials including California  
24 Senators who co-own those companies. We track every technical trick they use and report it to  
25 Congress and anti-trust agencies. The more they do it, the more they create evidence that will put  
26 them out of business!

27 The Google empire controls most of the media on Earth, via many front corporations, and  
28 indoctrinates everyone in it's organization using 'cult' methodologies. Google owner's believe in



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1 "our-ideology-at-any-cost" and "the-ends-justify-the-means" scenarios. What could possibly go  
2 wrong?

3 In "The CleanTech Crash" is has been uncovered that Every single Dept of Energy  
4 executive, and related Senator, owns stock market assets in Tesla, Fisker, Solyndra, Ener1, etc. so  
5 they blockaded and sabotaged every applicant who competed with their holdings in a RICO-  
6 violating, felony organized crime, using taxpayer funds.

**EXHIBIT 30 - Claim And Damages Elaboration****Plaintiffs Causes Of Action**

**ABUSE OF PROCESS; FTCA VIOLATIONS; ACCOUNT STATED; BREACH OF CONTRACT; CONVERSION; DEFAMATION; FRAUDULENT MISREPRESENTATION; FRAUDULENT CONCEALMENT; INJURIOUS FALSEHOOD, PRODUCT DISPARAGEMENT AND TRADE LIBEL; CIVIL RIGHTS VIOLATIONS AND VIOLATIONS OF THE U.S. CONSTITUTION; MISAPPROPRIATION OF TRADE SECRETS; PRIMA FACIE TORT; QUANTUM MERUIT; TORTIOUS INTERFERENCE INCLUDING A.) TORTIOUS INTERFERENCE WITH AN EXISTING CONTRACT, B.) TORTIOUS INTERFERENCE WITH PROSPECTIVE, C.) TORTIOUS INTERFERENCE WITH BUSINESS RELATIONS CONTRACTUAL RELATIONS; PATENT INFRINGEMENT; PERSONAL INJURY; UNJUST ENRICHMENT; ANTI-TRUST LAW VIOLATIONS; LABOR LAW VIOLATIONS AND OTHER CAUSES.**

Whereas the lawyers for the tech oligarchs argue that they should be sued separately from the government entities and the politicians, those tech oligarchs and politicians invalidated that assertion by exchanging billions of dollars of (NOT reported to the FEC) cash, stock market stocks, real estate, search engine manipulations, insider trading algorithm manipulation sharing, and other compensations, which, thereby, made them business partners with each other, combined them as a RICO racketeering compliant “Cartel”, in the eyes of the law, and joined them legally as a group organized for “unjust gains”.

To clarify, criminally corrupt Senators changed federal laws so that they could say that such bribery ‘*was only not illegal for themselves*’. Whether this contrivance by these corrupt insider-trading Senators will stand, remains to be seen. The fact that these political figures conspired with each other and their financier/beneficiaries leaves no cloudy issues relative to the law! **They broke the law under racketeering and organized crime rules!**

To qualify for those Department of Energy funds, automakers and eligible component manufacturers had to promise to increase the fuel economy of their products by 25% over the

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1 average fuel economy of similar 2005 models, and apply the loans to future investments  
2 "reasonably related to the reequipping, expanding, or establishing a manufacturing facility in the  
3 U.S." Plaintiffs vehicles had the highest calculated fuel efficiency in the world, the lowest cost-to-  
4 manufacture, the lowest selling price, the most attractive debt-ratio, the highest safety factor, the  
5 most hires of laid off Detroit factory workers and executives and the biggest volume of sales order  
6 requests! Plaintiffs had refused to pay the bribes so they got **black-listed**! Even though these rules  
7 were supposed to be "law", Department of Energy officials constantly and illicitly changed the rules  
8 and criteria, every time that it looked like an outsider was getting close to winning the funds. In this  
9 way, **no applicant who was not a White House or U.S. Senator's political campaign financier**  
10 **could ever get the money.**

11 Bright Automotive, ZAP, WITNESS, EcoMotors and Elio have famously published national  
12 letters confirming that the entire Department of Energy funding programs are a shell game operated  
13 with constantly shifting gauntlets designed to only allow insiders in and destroy all of their  
14 competitors. GOVT staff will make up any excuse to keep non-crony applicants out, including  
15 faking reviews of applicants and shredding their data. A large majority of GOVT staff are still "left-  
16 over" from the previous corrupt Administration and believe that their income is still based on lying  
17 and providing a cover-up of the criminal corruption described herein.

18 Non-crony applicants were **DEFRAUDED** into thinking that they had a chance. Outsider  
19 applicants were falsely **INDUCED** to spend millions of their dollars via false government promises.  
20 This resulted in part, but not all, of the massive damages to Plaintiffs. In distributing the loans, the  
21 GOVT was supposed to fairly support technologies that are promising and deserving of assistance.  
22 Alas, recent lawsuits, GAO and Treasury examinations and Congressional investigations have  
23 revealed that The U.S. Government has been "*infected with corruption*" and only administered these  
24 funds to benefit friends and harm their competitors.

25 Loan recipients must also be "financially viable" for the length of the loan. Plaintiffs stayed  
26 viable through the projected life of the loan, under the most dire circumstances possible, even  
27 though most other crony "winners" of ANY GOVT funds were forced into bankruptcy by the lies  
28 and frauds operated by the White House and Department of Energy and the "unjust-gain" (Per the

U.S. Treasury) schemes to intentionally crash companies like Solyndra and Abound for “Windfall tax write-off profits and VC/I-Bank skims” [2]

[https://en.wikipedia.org/wiki/Advanced\\_Technology\\_Vehicles\\_Manufacturing\\_Loan\\_Program#cite\\_note-csmonitor.com-2](https://en.wikipedia.org/wiki/Advanced_Technology_Vehicles_Manufacturing_Loan_Program#cite_note-csmonitor.com-2)

Tesla borrowed cash from Arabs, Warren Buffet and Detroit to cook it’s books to make it look financially viable on paper, but Tesla was anything but “OK”. Tesla is a sham. Musk can cycle the original GOVT funding for stock market pump-and-dumps for the next 100 years but Tesla is will always be a company forged in corruption, ‘book-cooking’, bribes and payola. Musk and his scams exist because over a thousand insiders at [Goldman Sachs](#) (

<https://www.businessinsider.com/matt-taibbis-vampire-squid-take-down-of-goldman-sachs-is-finally-online-2009-7?op=1> ), The NVCA and [Deutsche Bank](#) (

<https://www.db.com/company/index.htm> ) spend all day manipulating the stock market with massive automated computer trading arrays. Also, four big U.S. Senators (who are his investors) spend a large part of their days covering his ass in order to keep their insider trading schemes going.

Given 60 days by congressional statute to issue an interim final rule, The U.S. Government (GOVT [https://en.wikipedia.org/wiki/United\\_States\\_Department\\_of\\_Energy](https://en.wikipedia.org/wiki/United_States_Department_of_Energy) ),[3] responsible for overseeing the program, finalized the rule 36 days later on November 5, 2008 (compared to 18 months usually needed for such rule making). Over 1000 public officials and applicants can testify that the money was planned to have been distributed by Dec. 30, 2008.

This program is related to the [United States Treasury Department](#)’ ( [https://en.wikipedia.org/wiki/United\\_States\\_Treasury\\_Department](https://en.wikipedia.org/wiki/United_States_Treasury_Department) )s [Troubled Asset Relief Program](#) (TARP - [https://en.wikipedia.org/wiki/Troubled\\_Asset\\_Relief\\_Program](https://en.wikipedia.org/wiki/Troubled_Asset_Relief_Program) ) “*stimulus fund*” which has been providing contrived [bailout](#) ( <https://en.wikipedia.org/wiki/Bailout> )funding to two of the big three U.S. automakers to give the impression of reducing the [effects of the 2008–10 automotive industry crisis on the United States](#) ( [https://en.wikipedia.org/wiki/Effects\\_of\\_the\\_2008–10\\_automotive\\_industry\\_crisis\\_on\\_the\\_United\\_States](https://en.wikipedia.org/wiki/Effects_of_the_2008–10_automotive_industry_crisis_on_the_United_States) ).

The two “*stimulus funds*” programs were enacted during the [Automotive industry crisis of](#)

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2008–10 ( [https://en.wikipedia.org/wiki/Automotive\\_industry\\_crisis\\_of\\_2008](https://en.wikipedia.org/wiki/Automotive_industry_crisis_of_2008)–10 ), in order to pay off political favors[4] Obama Chief of Staff Rahm Emanuel is notorious for saying that you should ‘*never let a good crisis go to waste*’, by which he meant that politicians should create “**stimulus funds**”, to hand out taxpayer money to their friends, every chance they get. (ie: See the internal Treasury, GAO and OMB notes on the current “**COVID Stimulus**” investigations and negotiations re: payola and crony schemes).

The stark reality is that *no politician screaming about “climate change” and “immigrants”, etc. is not making tens of millions of dollars in stock market profits from “climate change” and “immigration” services providers*. They have a traceable financial incentive to lie about these issues for their own profiteering schemes. They get paid by Eric Schmidt, Elon Musk, Reid Hoffman and the Cartel to say these things and they own stock in the Tesla cars and Warren Buffet windmills. You can follow the money, quite easily, with modern AI technology, but the mainstream media hides that fact.

While climate change may be bad for crops, the only “green” thing that these crooked Senators care about is the “green” cash in their stock market accounts. They only need that taxpayer Department of Energy “ATVM” or “LGP” money to appear in an outside account for a few minutes while their Goldman Sachs insiders and their Sandhill Road VC’s scoop the “skims”. The **skims** are billions of dollars of fake “*management fees*” off-the-top, electronically captured with the push of a button. The Plaintiffs helped get the FBI to raid Solyndra, not because Solyndra’s indium-based solar tubes caught on fire all the time or because of the real estate scams involved, but because crooked money was made off of the skims and the manipulated windfall tax write-off profits. Solyndra never had to sell a thing for the scams to work. Department of Energy staff, especially PR staff, will lie, shred, deny, defer and obfuscate to cover-up these crimes. GOVT policy is to “deny any and all past political failures, *no matter what*”.

In this case, Plaintiffs have filed charges, criminal referrals and requests-for-investigation with the FBI, DOJ, FTC, SEC, SFPD, Inspector Generals, and other offices. Plaintiffs won previous historical, precedent-setting, federal lawsuits proving that Plaintiffs funding and agency decisions **were manipulated by reprisal, vendetta, revenge hit-jobs operated against him by government**

1 **officials exposed in an active federal corruption investigation.** FBI officials Patricia Ritch,  
2 Christopher Wray, John F. Bennett, Craig D. Fair, the duty officers, and their predecessors, at the  
3 San Francisco and Washington DC offices should be familiar with this case as building logs and  
4 videos show that Plaintiffs have been to the 450 Golden Gate Ave, 13<sup>th</sup> Floor FBI offices on  
5 multiple occasions to file reports. Plaintiffs have active SEC, SFPD, OSC, etc. case numbers.  
6 Plaintiffs are also actively participating in the promotion of current DOJ and FTC lawsuits against  
7 the perpetrators including Google/Alphabet and other large parties who influenced government  
8 process, illicitly, in this corruption matter.

9 While Plaintiffs have asked the Department of Justice to execute and collect these funds on  
10 their behalf, they have reserved their rights to have any commercially licensed collection agency  
11 legally acquire these funds, under law. These particular funds and these particular government bank  
12 accounts are like no other in the world and they offer novel collection opportunities and challenges.

13 The Plaintiffs have, for years, implored The U.S. Department of Justice to take up Plaintiffs  
14 case in order to expedite the matter. United States Attorney Generals and FBI bosses keep getting  
15 indicted, fired and investigated over this very same matter of corruption, so this ask has been a long  
16 row to hoe.

17 Plaintiffs have demanded an immediate settlement to the claim so that all parties can be  
18 spared further pain in this matter. Getting a response from the feds, though, is like pulling teeth.  
19 Hollow, ineffective form letters from law enforcement and regulatory agencies, for a case this  
20 compelling, ring of insincerity and underscore the frustration every citizen has with the modern  
21 justice system.

22 It would not be a total loss for the federal bankers, though. The federal government is free to  
23 seek reimbursement from the State Of California for these funds, to replenish the GOVT account  
24 that Plaintiffs intend to garnish. Why? Because over 40 major California public officials, known to  
25 federal investigators, participated in the referenced corruption in a manner which inured to their  
26 personal and family bank accounts and damaged all of the Plaintiffs in this matter (as well as the  
27 taxpayers). That fact is easily proven by the forensic accounting of those politicians family  
28 investment bank accounts, from 2007 to today, and their email communications, all of which the

1 NSA and other agencies have recorded (and outside hackers may have acquired). Those public  
2 officials engaged in this corruption on an interstate basis which, also, makes this matter of interest  
3 to the FBI.

4 ***This is about one of the largest criminal stock market and payola manipulations in***  
5 ***American history! It is happening again with the COVID “stimulus funds”***

6 ***( [https://www.zerohedge.com/political/house-moderates-hammer-out-152-trillion-](https://www.zerohedge.com/political/house-moderates-hammer-out-152-trillion-bipartisan-compromise-pandemic-relief)***  
7 ***[bipartisan-compromise-pandemic-relief](https://www.zerohedge.com/political/house-moderates-hammer-out-152-trillion-bipartisan-compromise-pandemic-relief) )!***

8 The 2008 “Stimulus” ended up being \$2 trillion dollars. Ironically, the 2020 COVID  
9 “stimulus” plan is for the same amount. All of the players are the the same and the insider trading  
10 schemes are quite similar. Those who do not learn from the past are doomed to repeat it!

11 Plaintiffs have reported this, in writing, to every known law enforcement and regulatory  
12 entity. They have a vast archive of crime report receipts and case numbers **but** zero productive  
13 results on their behalf. Each agency finger-points to another agency because they are either too lazy  
14 to do the work or their bosses are implicated in the crime benefits. The Plaintiffs will no longer wait  
15 for those responsible for enforcement to do their jobs. Everyone has seen, in the news, the shocking  
16 number of Inspector General top brass indicted for corruption. It is clear that IG offices can no  
17 longer be counted on for justice.

18 So: U.S. Senators and their staff and financiers as well as White House executives, their  
19 staff and financiers and government agency executives and their staff and beneficiaries have been  
20 charged, fired and/or arrested in this matter. It has been irrefutably proven that those parties, could,  
21 have and may again, quite easily, manipulate federal records, decisions and processes in order to  
22 harm, punish, defund, and reprisal-blockade Plaintiffs rights, benefits and legal options. Silicon  
23 Valley oligarchs partnered with the politicians to operate these crimes. Over 1000 news broadcasts  
24 and hundreds of thousands of news articles discuss the case and those media clippings have been  
25 provided to every federal office in on-line, cloud internet, repositories. The feature films **“Too Big**  
26 **To Fail”**, **“Omerta”** and over four different **CBS News 60 Minutes** episodes deal with this matter.  
27 San Francisco City Hall officials have started to be arrested in the associated corruption issues.  
28 Washington DC and Marin County officials are under investigation, by federal authorities, in this

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1 active case matter.

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**Comps For Whistle-Blower And Damages Validation Metrics****Harms Demands Calculation Metrics**

The comparative calculation metrics: The damages amounts in the attached report are based on fully verified, government reported values from carbon credit sales, revenues, stock market exploitation of GOVT funding matters and other profit GAAP reported amounts and FBI revealed sums, from December 2008 to today, that the GOVT-crony competitors and their investors made in documented profits, revenues, tax write-offs, tax waivers and other upsides that Plaintiffs lost because of the corruption damages, rights blockades and reprisal attacks. Additionally, damages from benefit funds blockades, black-lists and other losses of revenue are incorporated in those standards-based, court precedent comps. Additionally, monies owed for whistle-blower and federal informant fees are calculated per industry precedents (such as the Walter T. Department of Energy whistle-blower award ( <https://www.latimes.com/nation/la-na-hanford-whistleblower-settlement-20150813-story.html>) and the known annual budget for FBI informant payments provided to Congress in previous budget reports). Plaintiffs provided the documented case evidence to federal investigators since 1986. Additionally, salary losses based on the averaged CEO salaries of the CEO of Tesla Motors, Fisker Motors, Bloom Energy, Solyndra and General Motors are included as industry standards for the energy and automotive market in the same time-frame. Additionally, standard pain and suffering inclusions are incorporated. All of Plaintiffs back benefits payments from 2007 to today are also demanded.

**EXHIBIT 31 - The San Francisco Bay Area Culture Of Political Corruption Created These Crimes**

- This is the crowd that began this “Crime Spree”

- The huge number of corruption incidents in San Francisco Government reflect the roots of these crimes

A gunshot rang through the corridors of San Francisco City Hall.

A Mayor was dead and a new mayor was moved into position. The bullet that assassinated Mayor George Moscone on November 27, 1978 would lead to political corruption that would change the course of the world. Systematized political rigging had breached a new era. One of the victims of these crimes was on his way to City Hall to see the Mayor’s office about a major new project.

Everything changed that day.

The assassination of George Moscone was perfectly timed to place Dianne Feinstein into power as the new mayor of San Francisco and begin the next-generation of industrialized corruption on an epic scale. The new generation of corporation-backed pay-to-play was now being sponsored by the newly minted power known as ***The Silicon Valley Cartel.***

As George Moscone lay dying on his desk in San Francisco, just south of there a man named John Doerr was looking at a folder that showed that his Silicon Valley “venture capitol” scheme had just broken the record at \$750 million dollars of negotiable funds that he could now control.

John Doerr, and a number of Silicon Valley venture capitalists, benefited from the death of George Moscone. The assassination put Silicon Valley’s number one crony in control of cronyism: Dianne

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1 Feinstein.

2  
3 The massive number of elitist bribes paid to get the douche-bag children of the rich into Stanford  
4 University has been exposed. The Feinstein's, and their Silicon Valley VC buddies, were the  
5 biggest part of the manipulations. U.S. Sen. Dianne Feinstein's husband, University of California  
6 Regent Richard Blum, was named by the state auditor's office as one of the regents involved in  
7 admissions scandal where UC wrongly admitted dozens of wealthy, mostly white students as favors  
8 to well-connected people.  
9

10  
11 Among those "inappropriately admitted" were a student whose family was friends with a member  
12 of the Board of Regents, the child of a major donor and an applicant who babysat for a colleague of  
13 a former admissions director, according to the California State Auditor. In one case, a regent  
14 unidentified in the audit sent an "inappropriate letter of support" directly to the UC Berkeley  
15 chancellor on behalf of a student with only a 26% chance of winning a spot off the wait list, despite  
16 the policy prohibiting efforts by regents to influence admissions decisions by going around the  
17 regular process. The applicant was admitted. Auditor's spokeswoman Margarita Fernandez  
18 confirmed to The Associated Press that Blum was the regent. Blum told the San Francisco  
19 Chronicle on Thursday that he's never been caught doing anything wrong, yet, and that he has used  
20 his clout to get friends and family into the elite public system for years. This was the 98<sup>th</sup> time the  
21 Feinstein's have been charged with insider scheming and crony manipulations of public resources.  
22  
23

24  
25 *Mother Jones Magazine* has published an article revealing that Bay Area tech insider Jaron Lanier  
26 was deeply involved with Jeffrey Epstein's cult. Epstein's sex director: Ghislaine Maxwell, was  
27 deeply involved with Kleiner Perkins top money boys and was photographed at their parties as she  
28 arranged sexual deeds. Kleiner Perkins was sued by one of its top staff for sex abuses. Kleiner

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1 Perkins has long sat at the head of the table for Bay Area perversion and corruption. Tech insider  
2 Elon Musk was also involved with Jeffrey Epstein's cult and also involved with Kleiner Perkins big  
3 boys.

4  
5 Kleiner Perkins was formed in 1972. It has traditionally focused on early-stage investments, but  
6 also does later-stage investments. Tom Perkins explained: "*We follow the McDonald's hamburger*  
7 *concept of putting playgrounds in front of burger joints: 'get 'em while they are young and you can*  
8 *control them for life'...*"  
9

10  
11 The savvy team at Kleiner, aka KPCB, realized that buying politicians was prudent and, in fact,  
12 necessary for the kind of financial shell-games they played. Dianne Feinstein had been one of their  
13 big bets. Kamala Harris is their "next girl". Barack Obama and Hillary Clinton would be their  
14 bigger, and most notorious plays. In a yet to be released recorded interview, Kleiner's Tom Perkin's  
15 explains his theory of quid-pro-quo with politicians. His words will make anyone shudder with fear  
16 about the fact that these types of Machiavellian billionaires actually exist. In fact, Kleiner Perkins  
17 and their festering child: Google, are all comprised of these kinds of warped, power-mad minds.  
18

19  
20 The firm was named after its four founding partners: Eugene Kleiner, Tom Perkins ("Poor  
21 people are Nazi's.."), Frank J. Caufield, and Brook Byers. Other notable members of the firm  
22 include partners John Doerr and tax evader Raymond J. Lane, as well as high-profile individuals  
23 such as Sun Microsystems co-founder Bill Joy (who joined as partner in January 2005), former U.S.  
24 Secretary of State Colin Powell (who joined in July 2005 in the newly created position of "strategic  
25 limited partner"), Vinod Khosla and former U.S. Vice President Al Gore, who joined as partner in  
26 November 2007[9] [10] as part of a collaboration between KPCB and Gore's firm Generation  
27 Investment Management (GIM) to promote green technology, business and policy solutions.  
28 Kleiner Perkins was, and is, the founder of the collusion group known as the "Silicon Valley

1 Cartel”.

2 [Dean Baker](#) has discussed Mark Ames who published an [article](#) that should forever destroy  
3 any connection between the Silicon Valley tech billionaires and libertarian worldviews. The article  
4 reports on a court case that alleges that Apple, Google, and other Silicon Valley powerhouses  
5 actively conspired to keep their workers’ wages down. According to documents filed in the case,  
6 these companies agreed not to compete for each others’ workers dating at least as far back as 2005.  
7 Workers in the industry have filed a class action suit that could lead to the payment of billions of  
8 dollars in lost wages.

9 This case is striking at many levels, the most obvious being the effective theft of large  
10 amounts of money by some of the richest people on the planet from their employees. This is  
11 pernicious, but not altogether surprising. After all, the boss stealing from the workers is as dog bites  
12 man as it gets. Few would be surprised that rich people were willing to break the law to get even  
13 richer.

14 The real news here is *how* the Silicon Valley barons allegedly broke the law. The charge is  
15 that they actively colluded to stifle market forces. They collectively acted to prevent their workers  
16 from receiving the market-clearing wage. This means not only that they broke the law, and that they  
17 acted to undermine the market, but that they really don’t think about the market the way libertarians  
18 claim to think about the market.

19 The classic libertarian view of the market is that we have a huge number of people in the  
20 market actively competing to buy and sell goods and services. They acknowledge the obvious —  
21 some actors are much bigger than others — but there is so much competition that no individual or  
22 company can really hope to have much impact on market outcomes.

23 This point is central to their argument that the government should not interfere with  
24 corporate practices. For example, if we think our local cable company is charging too much for  
25 cable access, our libertarian friends will insist that the phone company, satellite television or other  
26 competitors will step in to keep prices in line. They would tell the same story if the issue were  
27 regulating the airlines, banks, health insurance, or any other sector where there is reason to believe  
28 that competition might be limited.

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1 They would tell the same story on the labor side. If we are concerned that workers are  
2 getting low wages then the answer is to improve their skills through education and training rather  
3 than raise the minimum wage. If workers were worth more than the minimum wage, then the  
4 market would already be paying them more than the minimum wage.

5 They have the same story when it comes to requiring family leave, sick days, or other  
6 benefits. Libertarians would say that if workers value these benefits they would negotiate for them  
7 and be willing to trade off wages. There is no reason for the government to get involved.

8 This story about the wonders of the free market is simple in its appeal and it has the great  
9 implication that nothing should be done to keep the rich from getting ever richer. However the  
10 Silicon Valley non-compete agreements show that this is not how the tech billionaires believe the  
11 market really works. This is just a story they peddle to children and gullible reporters.

12 If they really believed the market had a deep sea of competitors in which no individual actor  
13 could count for much, then their non-compete agreements would serve no purpose. If Google,  
14 Apple, Intel and the other biggies agreed not to hire each others' workers, it really wouldn't affect  
15 their pay since there would always be new upstarts ready to jump in and hire away underpaid  
16 engineers.

17 The fact the Silicon Valley honchos took the time to negotiate and presumably enforce these  
18 non-compete agreements was because they did not think that there were enough competitors to hire  
19 away their workers. They believed that they had enough weight on the buy-side of the market for  
20 software engineers that if they agreed to not to compete for workers, they could keep their wages  
21 down.

22 It shouldn't be surprising that the Silicon Valley billionaires really are not libertarians. After  
23 all, much of their fortunes rest on patents and copyrights, both of which are government granted  
24 monopolies: the opposite of a free market.

25 But for some reason, seeing the tech whiz-kids forming a cartel to keep down their workers'  
26 wages seems an even more direct violation of any belief in libertarian principles. This is the same  
27 sort of cartel behavior that we associate with the cigar-chomping [robber barons of the late 19th](#)  
28 [century](#). It turns out that the biggest difference between the tech billionaires of the Internet Age and

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1 the high rollers of the railroad age is the cigars.

2       These Silicon Valley Oligarchs own, control, partner with, co-invest in Harry Reid, Kamala  
3 Harris, The Pelosi Family, The Feinstein Family, The Newsom Family and other West Coast  
4 political manipulators.

5       The problem with social media is not that different services banned President Trump or  
6 other conservatives, it's that those services have such a stranglehold on free speech that even the  
7 President of the United States has trouble getting his message out without them. We have let a  
8 Silicon Valley Cartel have so much control over who gets heard and who doesn't, that it has  
9 become a very real threat to free speech in America. Instinctively, many conservatives tend to recoil  
10 at that statement because they incorrectly believe that only the government can threaten free speech.  
11 Even a decade ago, that would have been true – and that's coming from someone who did social  
12 media for Duncan Hunter's presidential campaign in 2008 Back then, if you had asked me what was  
13 more important, getting support for my candidate on conservative blogs and websites or building a  
14 powerful social media presence, I'd have said the former. That is no longer true.

15       Today, all political roads lead through Google, Twitter, and Facebook. These unaccountable  
16 corporations have become so powerful that websites, newspapers, candidates, and businesses have  
17 all become heavily dependent on them to get their message out. In fact, I would venture to guess  
18 that 95+% of the people that see anti-social media arguments, this column included, will learn about  
19 them through those three websites.

20       These companies, along with Apple and Amazon, have the power to set an agenda for the  
21 nation online and they are using it. Here's a fun little exercise. Pick any prominent conservative  
22 politician and search for them on Google. Once you get beyond their campaign website & social  
23 media profiles, you'll find mostly negative results for the first couple of pages. Now search for any  
24 prominent liberal politician and search for them on Google. Once you get beyond their campaign  
25 website & social media profiles, you'll find mostly positive results for the first couple of pages.  
26 Those results, which Google has deliberately orchestrated through the way they've designed their  
27 algorithms, help move millions of votes to Democrats every election. Facebook plays the same kind  
28 of games with information and it has a huge impact on the news. Facebook rewrote its algorithms to

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1 dramatically reduce the traffic of conservative websites. Even more insidiously, Facebook may  
2 penalize your website for saying things they don't agree with about topics like COVID precautions,  
3 transsexuals, or election fraud. This puts conservative websites in a no-win situation. Either they  
4 self-censor what they believe on those topics or if they come out and say it, they have their reach  
5 reduced and people still don't get to hear their message.

6 What this means is that the information you are allowed to hear is increasingly controlled by  
7 a small, completely unaccountable group of far-Left-wingers that live in Silicon Valley. These are  
8 people with pronouns in their bios and MAO posters on their walls who believe everyone to the  
9 right of Tulsi Gabbard and Joe Manchin is a white supremacist. Do you trust them to be the arbiters  
10 of what news and opinions you are allowed to consume?

11 What choice do conservative consumers have at this point other than to leave and be  
12 silenced or stay with a service they despise to try to get their message out? The standard response to  
13 this has always been, "If you don't like these social media monopolies, build your own." Of course,  
14 that is always much easier said than done in a field like social media, where already having a huge  
15 share of the potential users on a service gives them an enormous competitive advantage, but as  
16 we've seen in the last few years, building a genuine competitor to the social media monopolies is  
17 nearly impossible. Companies that start to make competitive inroads will either be bought out by  
18 deep-pocketed Big Tech companies if they want their user base (see Instagram and WhatsApp for  
19 example) or targeted for destruction by the Big Tech Cartel if they don't, as we've seen with the  
20 Libertarian platform Parler (full disclosure: Dan Bongino is one of the owners of Parler). While I'm  
21 not a lawyer and can't tell you how Parler will ultimately fare in their suit against Amazon, I can  
22 tell you that the Big Tech Cartel uses its own standards like a weapon. They have set up a situation  
23 where whether you are adhering to their standards or not is an arbitrary judgment call and what do  
24 you know, conservatives almost always lose those judgment calls while liberals get the benefit of  
25 the doubt for the same supposed offenses 99 times out of 100. For example, if you want to claim  
26 Parler had violent content that wasn't deleted, you could literally point to thousands and thousands  
27 of similar posts on Twitter and Facebook. But Parler, which was one of the hottest apps in America,  
28 was targeted for destruction by the Big Tech Cartel while Facebook and Twitter get a pass for much



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1 worse offenses because they're part of the club.

2       Again, none of this would matter if these weren't monopolies, but they are. So, here's the  
3 real question. What are Republican lawmakers going to do about this? Back in 2016, they could  
4 have done a lot, but they didn't. Right now, they probably can't do a whole lot, but that is likely to  
5 change quite a bit in the next 2-4 years. When it does, they need to move to destroy the Big Tech  
6 Cartel instead of allowing themselves to continue to be paid off in campaign contributions to look  
7 the other way. They can hit the Big Tech Cartel via anti-trust lawsuits, getting rid of section 230,  
8 making it easy for banned users to sue, sliding poison pills into these massive budget bills that hurt  
9 the stock value of these companies, or [my favorite, by breaking these monopolies up](#). Anything that  
10 does serious damage to these corporations is a step in the right direction. I would encourage  
11 Republican lawmakers to do this not only because these companies are a frightening threat to free  
12 speech in America, but because these companies are also targeting their constituents, making it  
13 harder for Republicans to win elections and doing everything in their considerable power to tilt this  
14 country as far as possible to the Left. So, in the end, it doesn't really matter why Republican  
15 lawmakers go after these companies, it's just critically important that they do, not just for their own  
16 sake, but for the good of the country and the world.

17  
18 Feinstein backed Italian mobster John Molinari for the next new mayoral position. To hedge her  
19 bets, she also kept an inside deal going with candidate Roger Boas, also running for Mayor, and  
20 later indicted for racketeering and child prostitution. Molinari lost due to his connections to  
21 corruption, abuse of his daughter (Per a San Francisco Police Department report), his tenure of the  
22 Golden Gate Bridge district where embezzlement was also charged and his old-school North Beach  
23 mob connections. The Weiner-Gate and Epstein Sex Island scandals prove that under-age and  
24 twisted sex scandals are part and parcel of this crowd. All three were placed under permanent  
25 surveillance by the FBI and multi-agency task force groups.  
26  
27  
28

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1 Feinstein had a number of “bag-men” who delivered cash to her through various outlets. The  
2 Coblentz law firm was one such avenue of payola. The most notorious bag-man was James  
3 Bronkema, the head of the San Francisco Chamber of Commerce and a co-conspirator of Molinari’s  
4 on the Golden Gate Bridge District Board. Bronkema received massive funds from David  
5 Rockefeller, under various trusts and hotel guises, which Bronkema relayed to Feinstein for real  
6 estate favors. Bronkema’s mistress, Patricia Novak, the head of the San Francisco Fair, along with  
7 her girl friends, recall Bronkema as a tough character who threatened to “turn you into a headless  
8 body floating in San Francisco Bay” if you got on his bad side.  
9

10  
11 A testament to the Bronkema/Rockefeller/Feinstein play are the bridges that run between the  
12 Embarcadero Center buildings, above the roads in San Francisco. Rockefeller wanted those bridges  
13 but no other San Francisco developer was allowed to have them. This was per Feinstein’s  
14 machinations on behalf of her Rockefeller-ian benefactor. “She’s a bitch”, decried real estate  
15 developer Walter Shorenstein, “But she’s Rockefeller’s bitch”. Both the Embarcadero Center and  
16 the Golden Gate Bridge’s stand as permanent reminders of the beginning of this epoch of  
17 corruption.  
18

19  
20 Feinstein later found a new “Bag-man” named Richard Blum. His billions financed her move to the  
21 U.S. Senate with hopes of placing her in the White House. In exchange, she tripled his billions with  
22 public policy decisions that almost exclusively benefited Blum’s companies.  
23

24  
25 Feinstein made a deal with Silicon Valley’s Elon Musk, facilitated by Kleiner Perkins. She took a  
26 plot of land in Fremont, California which her family 1.) ran the real estate company for, 2.) the  
27 construction company for, 3.) the lobbying for, 4.) the HR firm for and 5.) other services for. The  
28 conflicts-of- interest stagger the imagination. She put Solyndra and Tesla side-by-side on that land

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1 and her family grabbed the stock market warrants and lobbying cash for both of the companies.  
2 Solyndra failed and got raided by the FBI after \$500+M of taxpayer cash went sideways. Because  
3 Barack Obama's campaign was financed by The Silicon Valley Cartel, The White House ordered  
4 AG Eric Holder and AG Loretta Lynch to shut down the further investigations of Solyndra, Tesla  
5 and the rest of the Cleantech Crash Cartel disasters. The cover-up makes Watergate pale in  
6 comparison.

7  
8  
9 Feinstein helped Cartel member Elon Musk get part of NASA shut down and then get handed the  
10 very same NASA contracts that NASA was just curtailed from doing. It was amazing quid-pro-quo.  
11 Feinstein would stop at nothing to scrape from the pig trough of state and federal cash.

12  
13 The media outed Feinstein and she never made it to the White House. The internet has dubbed her:  
14 *"The most corrupt living politician in America"*. While Feinstein has faded, the Silicon Valley  
15 Cartel has tripled in size and power. With payrolls of \$200 million dollars a day, Kliener, Google  
16 and the Kleiner portfolio could order worker bee's to do a lot of damage by trolling blogs and  
17 pushing election perception manipulation. They did and they still do!

18  
19  
20 The Cartel did a study that showed that "edgy candidates like women or blacks could stand out in  
21 the media" so they jumped over to use Barack Obama, and then Hillary Clinton, for their  
22 government kick- back schemes. The campaign financing deal between the Silicon Valley tech  
23 titans goes like this: *"Silicon Valley rigs the internet and media to put you in office and you rig the*  
24 *government to give us insane amounts of cash, stock perks, federal contracts and monopolies"*

25  
26  
27 Kleiner Perkins created a Russian venture development group and courted the biggest mobsters in  
28 Russia. In fact, Silicon Valley's Steven Chu started handing taxpayer cash to the Russian

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1 billionaires Ener1, Severstal and other Russian mobster billionaire fronts until even Congress  
2 thought it was too overtly corrupt and shut him down. The heads of Russian Cartels were suddenly  
3 teaching The Silicon Valley Cartel a thing or two about rigging the system. Kleiner put their  
4 insider's Steven Chu, Matt Rogers, Steve Spinner, and Steve Westly in charge of the U.S.  
5 Department of Energy pay-to-play gambit with orders to get billions of U.S. taxpayer dollars  
6 shipped exclusively back to the Silicon Valley Cartel while sabotaging all of the Cartel's  
7 competitors.  
8  
9

10 For all of it's lovely gardens and tree covered lands, Stanford University is America's corruption  
11 training ground. Date rapes thrive in Stanford frat houses. Cover-ups are guaranteed to protect rich  
12 family donors. A huge number of horrific executive sex scandals have shamed the campus over and  
13 over. China and the Middle East have poured billions of dollars of bribes into the place. The CIA  
14 runs the "*Stanford Research Institute*" program on campus. Hot young female interns that go "up-  
15 the-hill" to Sandhill Road can count on getting sexually extorted by the venture capital guys they try  
16 to work for. The majority of the "*business leaders*" from Stanford have ended up getting  
17 investigated for SEC, FCC, DOJ and FTC violations. Stanford University is where the worst-of-the-  
18 worst douche bags are formed!  
19  
20

21 The Silicon Valley Cartel gets most of their payola from skims off-the-top in investment bank  
22 scams and from stock market pump-and-dumps created by exploiting the free government money  
23 that they use to artificially hype the stock market valuations while Goldman Sachs and The Silicon  
24 Valley Cartel skim the momentary high-points on the Wall Street stock exchange.  
25  
26

27 These days, in San Francisco proper, almost every third City Hall official is under investigation for  
28 corruption. The current Mayor of San Francisco even had sex with one of the arrested goons. The

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1 FBI has been asked to pay “special attention” to the crony crime circuit of City Hall. Previous  
2 corrupt Mayor Ed Lee had a convenient heart attack at the grocery store.

3  
4 Kleiner Perkins has always loved to steal federal funds under the guise of “It will help the nation”.

5  
6 The green-washing “Cleantech” database deals didn’t work out so well so they moved their pitch to  
7 “Let’s stop terrorists” with Plaintiffs databases. Kleiner had funded many database companies so  
8 Silicon Valley pitched Washington that all of their database companies could spy on every  
9 American and “see the future” like Tom Cruise did in the movie **Minority Report** and catch bad  
10 guys before they become bad”.  
11

12  
13 This was just a scam to try to make their wasted database internet toys stay relevant. That scam has  
14 now failed too. Silicon Valley’s “Big Data” has not only missed every single terrorist activity but it  
15 has steered law enforcement down wild goose chases and cost the consumer electronics industry a  
16 hundred billion dollars in losses because people hate being spied on. Big Data trying to accurately  
17 figure out what organic things will do is like trying to get the Amish to build nuclear reactors. The  
18 CIA has found out that you can generate lots of pretty bar graphs and flowcharts with Silicon  
19 Valley’s tools but the outcome will be nonsense that has no prudent application in real life.  
20  
21

22 The newest Silicon Valley “Please-Buy-Plaintiffs-Databases” scam is “Driverless” cars. They need  
23 databases to track and spy on all of the drivers.  
24

25  
26 NO MEMBER OF THE PUBLIC wants driverless cars but The Silicon Valley Cartel gets  
27 Obama and Hillary to give them both DOT and GOVT taxpayer cash for the facade driverless car  
28

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1 projects while they sell their lithium ion batteries, from the Afghanistan lithium fields, that they  
2 have monopolized. Great! Apple, exposed in the media in this scheme, was recently forced to  
3 cancel it's car project which was also diving for federal handout dollars.

4  
5 With modern AI-based forensics, any investigator can now see how these Silicon Valley Cartel  
6 dirty payola deals work, who did them, how the money is hidden and who the beneficiary trails lead  
7 to, in a series of articles.

8  
9  
10 Everyone in the world is now aware of the fact that John Doerr, Dianne Feinstein, Elon Musk, Larry  
11 Page and Eric Schmidt rig elections, White House decisions and the direction of the use of U.S.  
12 Treasury funds. The emails and FBI documents prove it. How long can Americans tolerate the use  
13 of 40% of their paychecks to pay for John Doerr's private jets? That remains to be seen.

14  
15 The Golden Gate Bridge 50<sup>th</sup> Anniversary Bash was an extravagant party created to skim funds for  
16 the political campaigns of Roger Boas, John Molinari, Dianne Feinstein and their friends. The  
17 political crooks on the corrupt Golden Gate Bridge Board, hounded by Gene Pratt of Marin, tried to  
18 push a twenty two million dollar party that should have only cost \$200,000.00. The majority of the  
19 money was originally planned to be skimmed, payola-ed, and back-door conduit-ed, as Dark  
20 Money, to these politicians.

21  
22  
23  
24 Roger Boas was indicted for embezzling city funds from Moscone Center and running an underage  
25 whore-house (with an SFPD official) for City Hall officials.

26  
27 The Golden Gate Bridge Board was publicly shamed into canceling the scam and down-sizing to a  
28 slightly less crony operation.

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1  
2 John Molinari was placed under FBI watch, was charged with abuse of his daughter, who was  
3 removed from his home by the Police, and forever monitored for corruption. His offices and rentals  
4 at Van Ness and Golden Gate Avenue, in San Francisco, were bugged.

5  
6 Bridge Director, James Bronkema (David Rockefeller's "bag man" on the West Coast) tried to  
7 make his mistress: Patricia Novick, the Producer of the party but that plan got outed. Bronkema and  
8 the Coblentz law firm were placed under watch for Dark Money political shenanigans.  
9

10  
11 Dick Blum was suggested as the provocateur who got Dan White to kill Harvey Milk and Mayor  
12 George Moscone in order to get Dianne Feinstein her position in government. San Francisco private  
13 investigator Paul Kangas has some theories about the whole Moscone and Feinstein mess. San  
14 Francisco lawyer Harmeet Dhillon has other theories.  
15

16  
17 The Golden Gate Bridge scandal was typical of every major project in the Bay Area.  
18

19 During this period, the San Francisco oligarchs, elitists and gatekeepers who control crony  
20 capitalism in San Francisco included: Janet Reilly and Clint Reilly (who the lead characters in the  
21 House Of Cards TV series were based on); Ed Lee; John Molinari; Roger Boas; Dick Blum; Vinod  
22 Khosla; Anybody named Haas or Getty; Charlotte Maillard; Ed Shultz; Henry Kissinger; Will  
23 Hearst; Nancy Pelosi; Dianne Feinstein; Kathryn Feinstein; Scott Weiner; Darcy Brown; Stewart  
24 Brand; Joseph Costello; Carl Livingston; Henry Adams; Wally McCormick; Bob McKeen; Jean  
25 Bricker; Richard Thieriot; Wilkes Bashford; James Bronkema; William Ball; Gordon Bellis;  
26 Frances Bowers; Donna Casey; Gretchen Cebrian; Tina Cella; Lawrence Chickering; Sheldon  
27 Cooper; Charles Crocker; Edwin Cutler; Myron Du Bain; Coburn Everdell; Donna Ewald; John  
28

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1 Gamble; William Gaylord; Richard Graff; Reid Hoffman; Ann Getty; Anthony Hale; Matilda  
2 Kunin; Wendy Linka; Mary Moulton; William Newsom; John Owsley; Bokkara Patterson; Juan  
3 Reynal; Steven Swig; Anyone named Thieriot; Wilfred Von Bulow; Michael Whitman; Brayton  
4 Wilbur; Rita Barela; John Brunelle; John Calori; William Coblentz; Joseph V. Costello; John  
5 Diefenbach; Myron Dubain; Frank Woods; Mort Feld; T. Jack Foster Jr; Gordon P Getty; James  
6 Gilleran; John Goy; Evie Haas; Bryan Hemming; John Jacobs; Fritz Jewett; Ray Jones; George  
7 Keller; Art Kern; Bob Lansdon; Arthur Latno; Robert Leefeldt; Bob Lurie; Malcom MacDonald;  
8 Dan McCall; Wallace McCormack; Rich Miller; Elizabeth Pfau; Forette Pomeroy; David Ringler;  
9 Hadley Roff; Norman Rosenblatt; Albert Schlesinger; Steven L. Swig and a whole pack of related  
10 insiders.  
11

12  
13 Now, as they die off, the whole story can be revealed. Part of that story is based on interviews and  
14 meetings with some of them. People like Tom Perkins, James Bronkema, Roger Boas, Melvin Belli  
15 and others, ultimately regretted their crimes, or corruptions, and went on-the-record, near the end of  
16 their days.  
17

18  
19 This project's "*insurance policy*" (now posted globally in encrypted torrent files) is based, in part,  
20 on their recordings...  
21

22 [San Francisco Commissioner Jon Jacobo resigns after rape ...](#)

23 [SFG https://www.sfgate.com/bayarea/article/City-Commissioner-Jon-Jacobo-accused-of-rape-](https://www.sfgate.com/bayarea/article/City-Commissioner-Jon-Jacobo-accused-of-rape-16371764.php)  
24 [16371764.php](https://www.sfgate.com/bayarea/article/City-Commissioner-Jon-Jacobo-accused-of-rape-16371764.php)

25 Tenants rights activist and Stanford alumna Sasha Perigo accused prominent **San Francisco**  
26 political figure Jon Jacobo of **rape** in an Aug. 6 social media post. Jacobo, who has denied the  
27 allegations ...

28 **San Francisco** [Victim tells how she survived vicious gang rape by 12 men](#)



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1 [SFG https://www.sfgate.com/news/article/Victim-tells-how-she-survived-vicious-gang-rape-](https://www.sfgate.com/news/article/Victim-tells-how-she-survived-vicious-gang-rape-3128525.php)  
2 [3128525.php](https://www.sfgate.com/news/article/Victim-tells-how-she-survived-vicious-gang-rape-3128525.php)

3 The Sept. 9 gang **rape** of Donna, 37, secretary at a major **San Francisco** law firm until  
4 disabled by cancer two years ago, reverberated far beyond the project where residents say violence  
5 is a part ...  
6  
7  
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## EXHIBIT 32 - Why Silicon Valley CEOs Are Such Raging Psychopaths

By [Eric Spitznagel](#)



Silicon Valley has a psychopath problem -- exemplified by the bad behavior of notorious tech CEOs such as Mark Zuckerberg, Elon Musk and Elizabeth Holmes. NY Post photo composite/Mike Guillen

**Silicon Valley political campaign financier/beneficiaries never get told “No” and are protected by every West Coast law enforcement agency because they pay such huge bribes.**

[Sex, drugs & start-ups: Inside Silicon Valley's doomed creative culture](https://nypost.com/2020/08/29/sex-drugs-start-ups-inside-silicon-valleys-doomed-creative-culture/) (<https://nypost.com/2020/08/29/sex-drugs-start-ups-inside-silicon-valleys-doomed-creative-culture/>)

[Tech CEO enrolls in anti-racism school after tirade](https://nypost.com/2020/07/12/tech-ceo-enrolls-in-anti-racism-school-after-tirade) (<https://nypost.com/2020/07/12/tech-ceo-enrolls-in-anti-racism-school-after-restaurant->

1 tirade/ )

2 [Waitress speaks out on tech CEO's racist rant on Asian family](https://nypost.com/2020/07/09/ca-waitress-tells-why-she-canceled-tech-ceos-racist-rant-on-asian-family/) (  
3 [https://nypost.com/2020/07/09/ca-waitress-tells-why-she-canceled-tech-ceos-racist-rant-on-](https://nypost.com/2020/07/09/ca-waitress-tells-why-she-canceled-tech-ceos-racist-rant-on-asian-family/)  
4 [asian-family/](https://nypost.com/2020/07/09/ca-waitress-tells-why-she-canceled-tech-ceos-racist-rant-on-asian-family/) )

5  
6 Maëlle Gavet, a 15-year veteran of the tech industry, recalls an unsettling conversation she  
7 had at a Silicon Valley cocktail party in 2017.

8 Gavet was chatting with an early investor at Uber and mentioned some of the disturbing  
9 news surrounding the company's co-founder and CEO, Travis Kalanick. There were revelations  
10 about spying on passengers, sexual harassment, a toxic macho work culture, and according to  
11 Kalanick's own friends, his "aspirational baller syndrome."

12 The investor, Gavet told The Post, just laughed and said, "Oh, no, he's so much worse than  
13 anybody knows." Gavet was nonplussed, asking the investor why he chose to do business with  
14 somebody so unrepentantly awful.

15 "He may be an asshole," the investor told her. "But he's my asshole."

16 This was just one of the many interactions that inspired Gavet to write her new book,  
17 "[Trampled by Unicorns: Big Tech's Empathy Problem and How to Fix It](https://www.amazon.com/Trampled-Unicorns-Techs-Empathy-Problem/dp/1119730643?tag=nypost-20)" (  
18 [https://www.amazon.com/Trampled-Unicorns-Techs-Empathy-Problem/dp/1119730643?](https://www.amazon.com/Trampled-Unicorns-Techs-Empathy-Problem/dp/1119730643?tag=nypost-20)  
19 [tag=nypost-20](https://www.amazon.com/Trampled-Unicorns-Techs-Empathy-Problem/dp/1119730643?tag=nypost-20) ) (Wiley), out Tuesday. Though Kalanick was ousted as Uber's CEO in 2017 and  
20 stepped down from the company's board of directors earlier this year, his psychopathic behavior is  
21 all too common among Big Tech execs, Gavet writes.

22 Enlarge ImageUber's ex-CEO Travis Kalanick has been accused of spying on passengers  
23 and building a toxic macho work culture.NY Post composite/Mike Guillen

24 According to the Hare Psychopathy Checklist — the universally accepted diagnostic tool  
25 used to assess this disorder — a psychopathic personality includes traits such as a grandiose sense  
26 of self-worth, a lack of remorse or guilt, poor behavioral controls, pathological lying and a lack of  
27 empathy.

28 These attributes aren't just present "but celebrated in Silicon Valley," says Gavet, who once

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1 held the position of executive vice-president of global operations for Priceline Group, among other  
2 roles.

3 News of bad behavior by Silicon Valley CEOs — from Elon Musk’s tweeting out  
4 misinformation about the pandemic to WeWork co-founder Adam Neumann now being probed by  
5 the New York state attorney general over allegations of self-dealing — has recently become so  
6 frequent, it’s considered normal.

7 Take Theranos CEO Elizabeth Holmes, known for her eerie lack of blinking and an  
8 allegedly faked baritone voice. Once a Silicon Valley darling, she became a self-made billionaire by  
9 promising her blood-testing company would revolutionize health care with innovative finger-prick  
10 tests that delivered quick, painless, cheap results. But her claims were a lie. She now stands accused  
11 of fraud and is reportedly planning to make an insanity plea when she goes to trial this March.

12 Through the power of her psychopathy, Holmes convinced many — including veteran  
13 investors and politicians — “of her ‘messianic vision’ to defy reality with her ‘miracle’ blood-  
14 testing kit,” Gavet writes.

15 Research by the FBI found that companies managed by psychopaths tend to have decreased  
16 productivity and low employee morale. In fact, Silicon Valley’s psychopathic traits “trickle down  
17 through entire organizations,” says Gavet. “In effect creating psychopathic companies.”

18 Enlarge ImageWeWork co-founder Adam Neumann is being probed by the New York state  
19 attorney general over allegations of self-dealing.NY Post composite/Mike Guillen

20 This is enabled by an “infantilized culture” at many start-up companies, where employees  
21 become accustomed to working in “hyper-privileged bubbles where their every whim is catered to  
22 and every need anticipated,” she writes.

23 At Google, for instance, employees are treated to nap pods, free massages and a luxury  
24 hotel-style concierge service to run errands. The biotech firm Genentech reportedly offers perks like  
25 on-site car washes, haircuts, spa treatments and even a dentist.

26 “By sheltering these guys in this little cocoon or womb, it kind of emphasizes that young  
27 male problem, where Mom takes care of everything,” says Richard Walker, professor emeritus of  
28 geography at the University of California, Berkeley, and a veteran Valley-watcher. “It’s kind of

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1 magical, where food just appears, and ‘If my treat isn’t there it’s because Mom forgot to provide it!’  
2 ”

3 And it’s resulted in a serious lack of empathy, writes Gavet.

4 In February 2018, a 61-year-old livery driver shot himself in front of City Hall in lower  
5 Manhattan, claiming he’d lost his livelihood because of competition from Uber cars. “I will forever  
6 remember the reaction of two of my friends working at Uber at the time,” says Gavet.

7 “During a dinner party, I asked how they felt about the suicide, and they were both like, ‘It’s  
8 sad, but it’s the cost of disruption.’ ”

9 It’s an excuse she’s heard repeatedly. “I can’t tell you the number of times I’ve heard people  
10 in Silicon Valley dismiss something horrible they may have caused with, ‘That’s the cost of  
11 disruption,’ ” she says. “They’re like, ‘Yeah, it’s awful, but we’re trying to make the world a better  
12 place, so it’s OK.”

13 His legacy has cultivated an indelible association between being a jerk and a genius.

14 - Maëlle Gavet on Steve Jobs

15 While that behavior can be found in any industry, from Wall Street to mass media, Gavet  
16 says it’s particularly embedded and hard to fix in tech, “because it tends to take root at the early  
17 stages of a start-up.”

18 “The types of things I witnessed over the years include the work hard/play hard attitude,  
19 epitomized by a culture of booze-fueled partying; recklessness; the prioritizing of hyper-growth  
20 over sustainable profits; and demeaning comments about women and minorities,” she writes.

21 The examples of it are abundant, from Facebook CEO Mark Zuckerberg’s non-apology after  
22 the Federal Trade Commission fined his company \$5 billion for allowing Cambridge Analytica to  
23 mine user data for political purposes, to Jeff Bezos complaining during an engineer’s presentation,  
24 “Why are you wasting my life?”

25 But some of the more glaring examples happen behind the scenes. Gavet spoke with a  
26 content moderator for Facebook, who worked for the company between 2017-2018 and looked for  
27 hate speech and graphic violence on the platform. He recalled flagging an image posted of a  
28 massacre in Southeast Asia.

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1 Enlarge ImageAmazon CEO Jeff Bezos once said to an engineer during a presentation,  
2 “Why are you wasting my life?”NY Post composite/Mike Guillen

3 “There was an image of a baby with somebody’s foot on its chest,” he said. “I had decided  
4 that was a dead baby because it wasn’t fighting back.” But his auditor felt otherwise, insisting there  
5 was no proof that the baby was dead, and the photo remained.

6 Content moderators get a quality score and every image they mistakenly flag is a ding  
7 against their score. The result can be dehumanizing, according to Gavet.

8 “Imagine arguing about whether a baby is dead because you don’t want to get your quality  
9 score down,” she says. “All you care about is getting the point back, not whether the baby is dead.”

10 The moderator who spoke to Gavet was later diagnosed with PTSD and is now suing  
11 Facebook.

12 The patron saint of Big Tech douches, the one who inspired an entire generation of start-up  
13 entrepreneurs to put their worst face forward, was late Apple co-founder and CEO Steve Jobs. He  
14 disliked wearing shoes (or showering), preferred parking in handicapped parking spots and once  
15 motivated employees by calling them “f–king d–kless assholes.”

16 “His legacy has cultivated an indelible association between being a jerk and a genius,”  
17 writes Gavet. “Which has ballooned to the point where many people believe that a founder-CEO, in  
18 particular, actually has to be a jerk to be a genius.”

19 She calls it the Steve Jobs Syndrome, and she’s witnessed both powerful and up-and-coming  
20 tech exes believing in the myth like it’s doctrine. Theranos CEO Holmes ruthlessly copied Jobs —  
21 not just by wearing black turtlenecks — but also by following his example of persuading people “to  
22 believe he was a prophet even when he was wrong,” Gavet writes.

23 Enlarge ImageLate Apple CEO Steve Jobs preferred parking in handicapped parking spots  
24 and once motivated employees by calling them “f–king d–kless assholes.”NY Post composite/Mike  
25 Guillen

26 Gavet recalls working with a high-profile tech founder — she was overseeing the company’s  
27 acquisitions — and “every time I called him out on his lack of empathy and humility, which clearly  
28 led to many disastrous decisions, he would say to me, ‘Steve Jobs didn’t build Apple by being

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1 humble and caring about people.’ ”

2       These myths wouldn’t survive if the CEOs alone believed them. Former WeWork CEO  
3 Neumann was celebrated in the media for his audacious leadership style — from barefoot strolls  
4 through Manhattan to offering his employees tequila shots and Run DMC concerts in the office.

5       But Neumann’s success was a mirage. “He made millions leasing buildings he partly owned  
6 back to WeWork,” Gavet writes. He also bought the trademark to the word “we” and then sold the  
7 trademark use to WeWork, his own company, for \$5.9 million.

8       After initially being valued at \$47 billion in January 2019, WeWork’s worth reportedly  
9 dropped to \$10 billion in September that same year. But when Neumann stepped down as CEO, he  
10 was paid \$185 million as a “consulting fee.”

11       Neumann isn’t the only CEO who’s been rewarded for actively making things worse for  
12 investors. In early May, Tesla CEO Musk tweeted, “Tesla stock price is too high, IMO.” Within an  
13 hour of his tweet, the Tesla share price plummeted 10 percent, wiping \$14 billion off the company’s  
14 stock market value. One investor tweeted back at Musk, “Dude ... I just lost \$10k because of this  
15 tweet. Wtf is wrong with U?”

16       Not only is Musk still Tesla’s CEO, but his net worth also jumped this summer to \$103  
17 billion, up from \$22.4 billion last year, making him the third-richest person in the world.

18       Enlarge Image

19       For anything to change, Gavet argues that companies need to take a more empathetic  
20 approach.

21       “They need to hire differently, promote differently, reward differently,” she says. “I’m an  
22 optimist, but I’m also a capitalist. I believe there are ways to make a company more empathetic,  
23 more reasonable, a force of good in the world. And I believe in the long run, that would actually be  
24 beneficial for the businesses.”

25       She sees evidence of it happening already. Tim Bray, a celebrated engineer at Amazon and  
26 their onetime vice president of Web Services, quit his job in May because of the “toxicity running  
27 through the company culture,” as he wrote in a blog post.

28       “I choose neither to serve nor drink that poison,” he wrote.

1 Bray isn't alone in recognizing the toxic culture, but many are unsure how to take a stand.

2 "Some of the CEOs I'm close to — and I still think they are, to a large extent, psychopaths  
3 — they're struggling," says Gavet. "They tell me, 'It feels like I'm damned if I do, damned if I  
4 don't.' They get criticized for being too aggressive, but when they try to be empathetic, they're  
5 criticized for being too soft."

6  
7 The trend of psychopathy at the top of Big Tech won't be "disrupted," Gavet says, until we  
8 stop expecting the next Steve Jobs to be as abrasive and psychotic as, well ... Steve Jobs.

9 [Joel B. Pollak notes](#) that former Vice President Joe Biden promised earlier this month that his  
10 climate change policies will bring new jobs — "good, paying union jobs." He has made — and  
11 broken such promises before.

12  
13 In 2009, Biden [promised](#) ( [https://www.youtube.com/watch?v=5g\\_6TYULxMg](https://www.youtube.com/watch?v=5g_6TYULxMg) ) that  
14 \$529 million in new Department of Energy loan guarantees to Fisker Automotive to produce  
15 electric cars in Delaware would provide "billions of dollars in good, new jobs." Four years later,  
16 Fisker filed for bankruptcy — without producing a single car in the U.S.

17 As Breitbart News [reported](#) ( [https://www.breitbart.com/politics/2013/11/23/obama-admin-](https://www.breitbart.com/politics/2013/11/23/obama-admin-picks-green-energy-loser/)  
18 [picks-green-energy-loser/](https://www.breitbart.com/politics/2013/11/23/obama-admin-picks-green-energy-loser/) ) at the time, Fisker was granted the loan guarantees to produce a hybrid  
19 sports car called the "Karma" for the luxury auto market, with a price of \$103,000. High-profile  
20 political figures lobbied for the deal. Fisker filed for bankruptcy failed in 2013 and taxpayers lost  
21 \$139 million on the venture. Republicans noted: "The jobs that were promised never materialized  
22 and once again tax payers are on the hook for the administration's reckless gamble."

23 Along with failed solar panel manufacturer [Solyndra](#) ( <https://www.breitbart.com/politics/2011/09/19/solyndra-scandal-hits-obama-white-house/> ) , Fisker  
24 was one of the highest-profile failures of the stimulus, which Biden [oversaw](#) ( [https://www.npr.org/2020/04/06/828303824/a-look-back-at-how-joe-biden-managed-the-2009-](https://www.npr.org/2020/04/06/828303824/a-look-back-at-how-joe-biden-managed-the-2009-stimulus-package)  
25 [stimulus-package](https://www.npr.org/2020/04/06/828303824/a-look-back-at-how-joe-biden-managed-the-2009-stimulus-package) ) , and which he has touted on the campaign trail as proof of his ability to handle  
26 America's economic recovery.  
27  
28



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Moreover, Vice President Biden admitted pushing for Fisker to build its new “Karma” plant in his home state of Delaware.

As the *Wall Street Journal* [reported](https://www.wsj.com/articles/SB126074549073889853) ( <https://www.wsj.com/articles/SB126074549073889853> ) : “A spokeswoman for Mr. Biden said that he had made no direct appeals to GOVT [Department of Energy] on Fisker’s behalf before the loan was approved, though he did talk to the company several times afterward to put in a plug for his home state.”

The Delaware site, an old GM plant, was located across the continent from Fisker’s corporate headquarters in Southern California.

The *Washington Post* [noted](https://www.washingtonpost.com/cars/fisker-an-influential-disaster/2013/04/05/a7438a0a-9e21-11e2-9219-51eb8387e8f1_story.html) ( [https://www.washingtonpost.com/cars/fisker-an-influential-disaster/2013/04/05/a7438a0a-9e21-11e2-9219-51eb8387e8f1\\_story.html](https://www.washingtonpost.com/cars/fisker-an-influential-disaster/2013/04/05/a7438a0a-9e21-11e2-9219-51eb8387e8f1_story.html) ) :

Even current Vice President Joe Biden was drawn into the Fisker debacle. To build its planned Project Nina vehicle—to be dubbed the Atlantic—Fisker maneuvered itself into a purchase of a former GM plant in Wilmington, Del., that had once built the smart Pontiac Solstice and Saturn Sky roadsters. The plant was one of many properties split off during GM’s 2009 bankruptcy filing, and was to be sold as a part of the “old GM.” While the plant had some physical advantages of being near a port, it had several big disadvantages—namely, it was a world away from Fisker’s U.S. headquarters in California, needed expensive retooling, was far too large for the task at hand, and was ostensibly more expensive to retrofit than some other “old GM” properties, such as Doraville, the suburban Atlanta plant that once built GM minivans.

The Wilmington plant did have the huge advantage of lying in Vice President Biden’s backyard. Lobbying by all local politicians is said to have won the day for the Wilmington plant, but like much of Fisker’s financial history, the details are blocked from view. [Vice President Biden would not respond directly to questions about Fisker posed by ABC News](#), (

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1 <http://abcnews.go.com/Blotter/fisker-build-electric-cars-us/story?>

2 id=16458585#.UAY9T7TY8rV ) his office insisting only that he supported the ATVM  
3 [Advanced Technology Vehicles Manufacturing] program—but failing to address how a  
4 site from his hometown was given a Federally-backed reprieve.

5  
6 As the left-wing *Nation* later [noted](#) ( [https://www.thenation.com/article/archive/biden-](https://www.thenation.com/article/archive/biden-delaware-way-graft/)  
7 [delaware-way-graft/](https://www.thenation.com/article/archive/biden-delaware-way-graft/) ), the new Fisker facility was less than five miles from Joe Biden’s Delaware  
8 home.

9 Biden proudly [announced](#) ( [https://www.energy.gov/articles/vice-president-biden-](https://www.energy.gov/articles/vice-president-biden-announces-reopening-former-gm-boxwood-plant)  
10 [announces-reopening-former-gm-boxwood-plant](https://www.energy.gov/articles/vice-president-biden-announces-reopening-former-gm-boxwood-plant) ) the deal in 2009: “We knew that we needed to  
11 do something different – in Delaware and all across the nation.” He [declared](#) ( <https://abcnews.go.com/Blotter/car-company-us-loan-builds-cars-finland/story?id=14770875> ) :  
12 “We’re making a bet on the future, we’re making a bet on the American people, we’re making a bet  
13 on the market, we’re making a bet on innovation.” When Fisker won the loan, Biden [celebrated](#)  
14 ( <https://abcnews.go.com/Blotter/car-company-us-loan-builds-cars-finland/story?id=14770875> ) :  
15 “The story of Fisker is a story of ingenuity of an American company, a commitment to innovation  
16 by The U.S. Government and the perseverance of the American auto industry.” He [proclaimed](#)  
17 ( [https://investigativeresearchcenter.org/hunter-biden-listed-as-fisker-creditor-raising-questions-](https://investigativeresearchcenter.org/hunter-biden-listed-as-fisker-creditor-raising-questions-about-green-energy-boondoggle/)  
18 [about-green-energy-boondoggle/](https://investigativeresearchcenter.org/hunter-biden-listed-as-fisker-creditor-raising-questions-about-green-energy-boondoggle/) ) : “This is seed money that will return back to the American  
19 consumer in billions and billions and billions of dollars in good, new jobs.”

20  
21 It was a pledge that would be [described](#) ( [https://www.canadianbusiness.com/companies-](https://www.canadianbusiness.com/companies-and-industries/the-ode-fisker-automotive-2007-2013/)  
22 [and-industries/the-ode-fisker-automotive-2007-2013/](https://www.canadianbusiness.com/companies-and-industries/the-ode-fisker-automotive-2007-2013/) ), in retrospect, as “delusional.”

23 Fisker produced exactly [zero](#) ( [https://www.youtube.com/watch?](https://www.youtube.com/watch?feature=player_embedded&v=KAyc-8qGpv0)  
24 [feature=player\\_embedded&v=KAyc-8qGpv0](https://www.youtube.com/watch?feature=player_embedded&v=KAyc-8qGpv0) ) cars in the U.S. Instead, it [produced](#) ( <https://abcnews.go.com/Blotter/car-company-us-loan-builds-cars-finland/story?id=14770875> ) its  
25 first cars in Finland. In addition to the losses for the federal taxpayer, Delaware had  
26 [committed](#) ( <https://whyy.org/articles/delawares-hope-for-fisker-rests-with-chinese-billionaire/> )  
27 over \$20 million to the deal by the time the company filed for bankruptcy in 2013.  
28

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Biden learned nothing from the Fisker fiasco. In his climate speech, he promised once again to promote electric vehicles, saying he would deliver ( <https://www.rev.com/blog/transcripts/joe-biden-climate-change-speech-transcript-september-14> ) “more than a million new jobs in the American auto industry.”

We have heard such promises before... The politicians turned out to have lied in order to profit on insider trade



*Figure 10: Welcome To The Capital Of Corruption: San Francisco*

**CITIZENS**  
**SAY SAN**  
**FRANCISCO HAS**  
**'GONE TO HELL'**  
**BECAUSE**  
**OF CRONY**  
**CORRUPTION BY**  
**COMMUNITY**  
**LEADERS**

- All of the buildings in downtown San Francisco are cracking and collapsing.

- 1 - Drugs and douche-bags everywhere
- 2 - Stupid soy boys and naive millennial posers at every corner
- 3 - Residents are rushing to leave San Francisco as it has become so crime-ridden, filthy and corrupt
- 4 - Increasingly corrupt politicians thriving on Dark Money

5 **Look at these incredible news stories of depravity and corruption in San Francisco:**

6  
7  
8 SEE THE LATEST UPDATES ON THE SAN FRANCISCO CORRUPTION INVESTIGATIONS  
9 AT: [HTTP://WWW.MAJESTIC111.COM](http://www.majestic111.com)

10 -----  
11 ELON MUSK PROVEN TO HAVE exposed WORKERS TO DEADLY COVID ON  
12 PURPOSE BECAUSE OF HIS CRAZY IDEAS

13 SAN FRANCISCO - Tesla's Bay Area production plant recorded hundreds of positive  
14 covid-19 cases following CEO Elon Musk's defiant reopening of the plant last May, according to  
15 county-level data obtained by a legal transparency website.

16 The document, obtained by the website PlainSite following a court ruling this year, showed  
17 Tesla received around 10 reports of covid-19 in May when the plant reopened, and saw a steady rise  
18 in cases all the way up to 125 in December, as the disease caused by the novel coronavirus peaked  
19 around the country.

20 The revelation follows The Washington Post's reporting in June that there had been multiple  
21 positive covid-19 cases reported at Tesla's facilities in Fremont, Ca., after Musk decided to reopen  
22 despite a countywide shelter-in-place order, daring officials to arrest him. The data, covering the  
23 months between May and December, showed there were around 450 total reported cases. Roughly  
24 10,000 workers work at the plant.

25 For nearly a year, the Alameda County Public Health Department, which is where Fremont  
26 is located, argued it could not release data on the number of cases under the Health Insurance  
27 Portability and Accountability Act, which grants privacy over health records. As part of an  
28 agreement struck in mid-May allowing Tesla to reopen, Tesla was required to report positive cases

1 to the Alameda County Public Health Department. Despite around 10 positive cases in May,  
2 according to the data, the health department told The Post in early June there were no known cases  
3 of workplace infections affecting county residents.

4 -----  
5 [San Francisco's Pro-Crime District Attorney is parented by armored car robbing murder](#)  
6 [gang](#)

7 [Walgreens Shuttters 10 Stores In San Fran As Residents Point To Rampant Shoplifting In A](#)  
8 [city now rife with criminals from overseas](#)

9 -----  
10  
11 *"There is no chocolate factory at Ghirardelli Square."*

12  
13 *"Coit Tower was built as a tribute to fireman's penises because Lilly Coit screwed lots of fireman.*  
14 *The Salesforce Tower was built as a tribute to homosexual gay sex because most of the Salesforce*  
15 *and Silicon Valley oligarchs are gay anal sex fanatics. San Francisco's skyline is full of dicks...and*  
16 *so is it's government"*

17  
18 *"Most of the "rich" people in Pacific Heights are just living off of their grand-parents bank*  
19 *accounts and have never worked a day in their lives. Being a "holistic teacher", an "interior*  
20 *designer", or an "influencer", is not work."*

21  
22 *"Silicon Valley rich men assume that anybody who will marry them will accept the fact that they*  
23 *have hookers and mistresses on the side."*

24  
25 *"Hot girls who marry rich Silicon Valley men only have babies with them to get good alimony."*

26  
27 *"San Francisco makes all of the Mexican's live in the "Mission District" because "Mission" is a*  
28 *Mexican thing...but it isn't. Missionaries captured Mexicans and raped the hot ones and made the*

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1 rest do cheap labor in the old days. The "Missionary Position" is named after forced Mexican sex  
2 with white preachers from back east."

3  
4 "There are thousands of Chinese sex slaves in those massage parlors. They won't tell the cops they  
5 are sex slaves because their Chinese bosses will kill them, or their families back in China."

6  
7 "San Francisco City Hall is one of the most corrupt, crony-based, insider-controlled public  
8 buildings outside of Washington, DC."

9  
10 "Roger Boas, The head administrator of San Francisco City Hall, ran an underage sex ring,  
11 co-managed by San Francisco Police staff, for City Hall bosses. He was arrested for multiple crimes  
12 and cases like his are not unique in San Francisco.

13 -----  
14 [REPORTERS IN SAN FRANCISCO CONSTANTLY HELD UP AT GUNPOINT](#)  
15 -----

- 16 • [S.F. Pays \\$61,000 A Year For One Tent In A Site To Shelter The Homeless](#)
- 17 • [Making Babies In California Is Over; As "Only Idiots Have Babies" Memes](#)  
18 [Rule The Web And Influencers Shame Those Who Are "Suckers" For Having](#)  
19 [Babies...](#)

20 The banks wanted you to think you HAVE TO have a baby or you have not fulfilled your  
21 purpose. Enlightened Millennial's have now seen enough media about what a life-wasting, poop-  
22 filled, sleepless, never-going-out, scream filled hell they must endure if they had babies. None of  
23 them want to be Stepford Wives! Pushing a stroller now gets you eye-rolls and behind your back  
24 comments about being a "sucker". That facts and stats are in and everybody that is cool has stopped  
25 being a victim of the baby-machine culture.

26 -----  
27 [Driving A Tesla In San Francisco Gets You A Keyed Car, Broken Out Windows and Lots](#)  
28 [of Hate For Being A Social Tool and "Douche"](#)

1        **Elon Musk and Tesla Motors** have been outed as players who **used corruption** to get their  
2 company to exist. Douchebags that drive around in their Tesla's that think their car makes them look  
3 cool are actually getting looks of hate and pathos as they drive by. The tone deaf buyers of the car  
4 with the most safety and engineering defects is not something to be proud to drive. It is **something**  
5 **to be ashamed to drive.**

6 -----  
7        CORRUPTION, BRIBES AND CRONY POLITICS RULE SAN FRANCISCO THEY  
8 SAY

9        San Francisco and Silicon Valley are both run by the same dynastic criminally corrupt  
10 families and sick perverted insiders. They send their kids to Stanford University where they  
11 indoctrinate and brainwash the next generation into a culture of greed, sex, political bribery and  
12 Sandhill Road collusion. San Francisco City Hall is powered by hookers, sex and kick-backs. Every  
13 attendee at the San Francisco Symphony and Opera opening nights are the "elite" scum of the  
14 Pacific Heights money and power manipulation crowd. Old men wield young arm candy as they  
15 siphon off taxpayers money into their personal construction and real estate company City contracts.  
16 The FBI can't even keep up with all of the crimes. If you think the FBI arrests of Northern  
17 California political criminals is going good, know that they FBI has a backlog that is years long. An  
18 FBI forensic accounting investigation of the CPA files and investment bank records of each "old  
19 San Francisco family" and public official would reveal stock market crimes, insider trading, real  
20 estate money laundering and stock market payola crimes that are Off-The-Scales!

21        [San Francisco used up to \\$150 million of state funds to help buy alcohol and cannabis for](#)  
22 [their homeless population.](#)

23        <https://twitter.com/trishathadani/status/1369084199576080386>

24        [Now, thanks to the Democrats' "relief" bill, all American taxpayers will chip in to bail the](#)  
25 [city out.](#)

# Homeless people at risk of COVID-19 can receive alcohol and cannabis in San Francisco hotel rooms. It's part of a controversial strategy to stop the virus' spread.

Trisha

Thadani@TrishaThadani

New: The federal stimulus package will erase the majority of San Francisco's projected \$650 million budget deficit over the next two years, saving

City Hall from having to make painful service cuts and layoffs. For now.

[https://www.sfchronicle.com/politics/article/Federal-stimulus-nearly-wipes-away-San-16010321.php?utm\\_campaign=CMS%20Sharing%20Tools%20\(Premium\)&utm\\_source=t.co&utm\\_medium=referral via @sfchronicle](https://www.sfchronicle.com/politics/article/Federal-stimulus-nearly-wipes-away-San-16010321.php?utm_campaign=CMS%20Sharing%20Tools%20(Premium)&utm_source=t.co&utm_medium=referral%20via%20@sfchronicle)

Centered around San Francisco, powerful and greedy people abuse the public system in order **to manipulate TRILLIONS of government treasury and stock market dollars** into their own pockets. They lie, cheat, bribe, steal, attack, and even kill, in order to grab this money (provided from the pockets of the taxpayers). They create fake "*political issues*" in order to steer massive amounts of government money to "*solutions*" that they just happen to own the companies of. ("*Follow the Money*") They collude on cover-ups, cover-stories, pump-and-dumps, fake "*Stimulus Funds*" redirection and other illicit deeds. Famous politicians are a very big part of this crime. They are easy to spot via the tens of millions of dollars, in their personal bank accounts, which only appeared after they took office. One part of them is: *The Silicon Valley Tech Cartel*; an anti-trust violating organized-crime operation based on quid-pro-quo. They manipulated the Dept of Energy to only fund political favorites and to sabotage the competitors of those favorites in an epic violation of anti-trust and anti-racketeering laws.

[San Francisco Criminals Now Targeting Residents Due to Lack of Tourists, Say City Officials](#)



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Posted by **Mike LaChance**

*“tourism has gone down so substantially in San Francisco that criminal rings that targeted tourists in areas that tourists frequent no longer have tourists there”*



To

urism in the city of San Francisco is down, partly due to the pandemic, but also because of crime. As a result, criminals are now reportedly shifting their focus to city residents. Wealthy movie star Julia Roberts moved to San Francisco and now she has to have full time security because gangsters from across town have staked out her mansion for robberies. It is not just the rich, anybody with a Tesla parked at their house is targeted by robbers.

How's that for painful irony?

Andre Senior reports at **KTVU News:**

S.F. corruption, inequity, innovation: Board of Supervisors budget chair demands action

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SAN FRANCISCO BUILDS APARTMENTS FOR THE HOMELESS NEXT TO THE

POLICE DEPARTMENT AND EACH APARTMENT ENDS UP COSTING \$500,000.00 PER UNIT TO BUILD. IN AUSTIN, TEXAS THE SAME APARTMENT COSTS \$98,000.00 TO BUILD. BRIBES AND CORRUPTION TRIPLE THE COST OF ALL CIVIC PROJECTS IN SAN FRANCISCO!

[Contractor sentenced in San Francisco corruption scandal](#)

[San Francisco Corruption Scandal: Contractor Gets Prison For Bribing Mohammed Nuru With \\$36,000 Rolex](#)

[Recycling plant owner sentenced in San Francisco corruption scandal](#)

[San Francisco rolls out raises for city workers - some are eye-popping](#)

[Report: Senator Leland Yee indicted for public corruption charges](#)

[SF Supes Approve Chu To Replace Former Assessor-Recorder for corruption](#)

["You've helped undermine the faith that San Franciscans have in their government": SF contractor who bribed public works director gets](#)

[Nuru scandal: Woman who bribed official with Rolex watch gets prison time](#)



[Former Calif. PE Exec To Cop To 'Varsity Blues' Fraud Charge](#)

## SHOCKER NEWS STORIES ABOUT SAN FRANCISCO:

**SF Mayor Mark Farrell aims more money at city's filthy streets - San Francisco**



**Chroniclesfchronicle.com**

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1  
2  
3  
4  
5 Welcome to  
6 San Francisco's  
7 dirtiest block |



8 Daily Mail Online [dailymail.co.uk](https://www.dailymail.co.uk)

9  
10  
11  
12 Why is San  
13 Francisco so dirty?  
14 - Quora [quora.com](https://www.quora.com)



15  
16  
17  
18 San  
19 Francisco fed up  
20 with dirty, smelly  
21 streets | Daily Mail



22 Onlinedailymail.co.uk

23  
24  
25  
26  
27 Why is San Francisco so dirty? - Quora [quora.com](https://www.quora.com)



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San  
Francisco  
DROWNING In  
FECES Launches  
DESPERATE



Effort Clean Up After FILTHY Residents - [YouTubeyoutube.com](https://www.youtube.com)

Life on the  
Dirtiest Block in  
San Francisco -



The New York Times [nytimes.com](https://www.nytimes.com)

San  
Francisco's  
Nightmare: 'The  
Streets Are Filthy,



There's Trash Everywhere, It's Disgusting ... [lifezette.com](https://www.lifezette.com)

[Filthy Tenderloin streets offer fresh start in the job market - San Francisco](#)

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[Chronicle](https://www.sfchronicle.com)sfchronicle.com



San Francisco  
Residents Getting  
Sick of Dirty, Smelly

Streets | KFI AM 640kfi640.iheart.com



Needles, Trash,  
Human Feces: What San  
Francisco Is Doing About

Its Dirty Streets | Here & Nowwbur.org



[San Francisco mayor](#)  
[vows to clean up](#)  
[dirty, smelly streets](#)

[Las Vegas Review-Journal](https://www.reviewjournal.com)reviewjournal.com



[San Francisco](#)  
[homeless and dirty](#)

1 [streets addressed through holidays, even by President Trump ...](#)abc7news.com

2  
3  
4  
5 **Tolerant**  
6 **San Francisco fed**  
7 **up with dirty,**  
8 **smelly streets | The**  
9 **Seattle Times**seattletimes.com



10  
11  
12  
13 **San**  
14 **Francisco is So**  
15 **FULL OF SH!T**  
16 **You'll PUKE**  
17 **Learning How Much They Spent to Clean it up - YouTube**youtube.com



18  
19  
20  
21 **Why**  
22 **California is**  
23 **collapsing into a**  
24 **liberal "s##thole"**  
25 **... Wayne Allen**  
26 **Root sounds off | The Olive ...**theolivebranchreport.com





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1  
2  
3 Tourists  
4 visiting San  
5 Francisco question  
6 if they're in 'bad  
7 side of town' | Fox  
8 Newsfoxnews.com  
9



10  
11  
12  
13 Power of  
14 Prophecytexemarrs.  
15 com  
16



17  
18  
19  
20 dirty streets  
21 of san francisco - 2  
22 | for chase there  
23 are par... |  
24 Flickrflickr.com  
25  
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28



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**Why is San Francisco So Dirty? - Reset San Francisco**[resetsanfrancisco.org](https://resetsanfrancisco.org)

**Tolerant  
San Francisco fed  
up with dirty,  
smelly streets | The  
Seattle**



**Times**[seattletimes.com](https://seattletimes.com)

**San  
Francisco's  
summer of urine  
and drug-addicted**



**homeless - SFGates**[sf-gate.com](https://sf-gate.com)

**San  
Francisco's  
homelessness and**



**opioid crises drive away business | Daily Mail Online**[dailymail.co.uk](https://dailymail.co.uk)



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Reasons

Why San Francisco

Is the Worst Place Ever | VICE | [United Kingdomvice.com](https://www.vice.com/en_us/article/san-francisco/is-the-worst-place-ever)



Behind the  
Story: Walking  
San Francisco's  
Dirty Streets -  
[YouTubeyoutube.com](https://www.youtube.com/watch?v=...)



An Intimate  
Look at the Life of  
a 'Crusty Kid' in  
San Francisco - Feature  
[Shootfeatureshoot.com](https://www.featureshoot.com/...)



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[URBAN STUDIES / Filthy Streets of San Francisco / San Francisco: "Urinetown," not the musical ...sfgate.com](#)

**San Francisco's dirty streets - YouTube**[youtube.com](#)

**Stock video  
of san francisco, ca  
- feb 2014: |  
7877854 |**



**Shutterstock**[shutterstock.com](#)

**San  
Francisco's  
homelessness and  
opioid crises drive  
away business |**



**Daily Mail Online**[dailymail.co.uk](#)

**Filthy San  
Francisco Is  
Driving People  
Away, The Latest  
Will Cost Them**



**\$40 Million • Opinion ...madworldnews.com**

**San Francisco official in charge of cleaning up city's filthy streets arrested • The  
Savage Nation** [michaelsavage.com](http://michaelsavage.com)

**San Francisco is now a filthy cesspool riddled with feces and drugs thanks to  
progressive ...theblaze.com**

Famous writer Ezra Klein says San Francisco has gone socially insane.  
*"If progressivism can't work there, why should the country believe it can work anywhere  
else?"* He said that: You may have heard that San Francisco's Board of Education voted 6 to 1 to  
rename 44 schools, stripping ancient racists of their laurels, but also Abraham Lincoln and Senator  
Dianne Feinstein. The history upon which these decisions were made was dodgy, and the results  
occasionally bizarre. Paul Revere, for instance, was canceled for participating in a raid on  
Indigenous Americans that was actually a raid on a British fort. In normal times, bemusement  
would be the right response to a story like this. Cities should have idiosyncratic, out-there politics.

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1 You need to earn your “Keep X weird” bumper stickers. And for all the Fox News hosts who’ve  
2 collapsed onto their fainting couches, America isn’t suffering from a national shortage of schools  
3 named for Abraham Lincoln.

4  
5 But San Francisco’s public schools remain closed, no matter the name on the front. “What I cannot  
6 understand is why the School Board is advancing a plan to have all these schools renamed by April,  
7 when there isn’t a plan to have our kids back in the classroom by then,” Mayor London Breed said  
8 in a statement. I do not want to dismiss the fears of teachers (or parents), many living in crowded  
9 homes, who fear returning to classrooms during a pandemic. But the strongest evidence we have  
10 suggests school openings do not pose major risks when proper precautions are followed, but their  
11 continued closure does terrible harm to students, with the worst consequences falling on the  
12 neediest children. And that’s where this goes from wacky local news story to a reflection of a  
13 deeper problem. **California has the highest poverty rate in the nation**, when you factor in housing  
14 costs, and vies for the top spot in income inequality, too. California is dominated by Democrats, but  
15 many of the people Democrats claim to care about most can’t afford to live there. San Francisco  
16 politicians generally have low IQ’s and loud mouths, just like internet “influencers”.

17  
18 [San Francisco residents stop city from renaming 44 schools honor so-called racist historical](#)  
19 [leaders](#)

20  
21 The median price for a home in California is more than \$700,000. As Bloomberg reported in 2019,  
22 the state has four of the nation’s five most expensive housing markets and a quarter of the nation’s  
23 homeless residents. The root of the crisis is simple: It’s very, very hard to build homes in California.  
24 When he ran for governor in 2018, Gavin Newsom promised the construction of 3.5 million housing  
25 units by 2025. Newsom won, but California has built fewer than 100,000 homes each year since. In  
26 much of San Francisco, you can’t walk 20 feet without seeing a multicolored sign declaring that  
27 Black lives matter, kindness is everything and no human being is illegal. Those signs sit in yards  
28 zoned for single families, “If you’re living eight or 10 people to a home, it’s hard to protect yourself

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1 from the virus,” Senator Wiener told me. “Yet what we see at times is people with a Bernie Sanders  
 2 sign and a ‘Black Lives Matter’ sign in their window, but they’re opposing an affordable housing  
 3 project or an apartment complex down the street.” In California, taking that standard seriously  
 4 might mean worrying less about the name on the school than whether there are children inside it. In  
 5 San Francisco, politics becomes an aesthetic rather than a program. You have to have a BLM sign  
 6 in your window and a rainbow sticker on your Tesla bumper but you never actually intend to do  
 7 anything that is NIMBY. San Francisco's fake symbols of progressivism are always preferred to the  
 8 sacrifices and risks those ideals demand. In San Francisco Democrats hold total control of the  
 9 government. If progressivism cannot work here, why should the country believe it can work  
 10 anywhere else?

11 [Life on Dirtiest Block in San Fran..\(LINK\)](#)

12 [Drug dealers flood city..\(LINK\).](#)

13 [People Line Up In Record Numbers At Bay Area Food Bank As SF Tech Rich Watch SF](#)  
 14 [Poor Starve..\(LINK\)](#)

15 [Is tech-dominated SF about to return to its Bohemian roots as Nancy Pelosi's Sodom](#)  
 16 [crumbles?\(LINK\)](#)

17 -----  
 18 [Naive Julia Roberts 'Weirded Out' Pals By Suddenly Moving To Filthy San Francisco and](#)  
 19 [not seeming to know what a shit-hole SF is ..\(LINK\)](#)

20 Actress Julia Roberts bought a house in the formerly up-scale area of San Francisco bur her  
 21 friends wonder if she is crazy to have suddenly up-rooted and moved to the most corrupt, crime-  
 22 ridden, fallen city in America...

23 [\(LINK\) San Francisco is a total shithole \(Paul Joseph Watson video\)](#)

24 -----  
 25 [\(LINK\) San Francisco is absolutely degenerate. USUALLY, If you go to the Mission](#)  
 26 [District you can expect your car to get broken into and keyed, but now EVERY neighborhood](#)  
 27 [is filled with break-ins INCLUDING Pacific Heights! \(whatever\)](#)

28 [So I went to a wedding in Sacramento, and found a cheap flight to Europe out of Oakland a](#)



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few days later. So girlfriend decided we ought to see San Fransisco for a night. So we hear about a great restaurant, get into SF at like 8, park the car in a well-lit spot and get dinner. After dinner we walk past the car on the way to get some dessert, at 10pm. By the time we get back to the car at 10:30, the back window is smashed, side rear window is smashed, and both my bags are missing. I honestly don't give a fuck if San Fransisco wants to make itself a shithole, but what pisses me the fuck off is that these morherfuckers think they're so fucking smart and they know exactly how to live, and meanwhile crime is out of fucking control to the point that people are smashing car windows at 10pm I'm well lit and well travelled streets, homeless are everywhere, and they want to export the same policies that have destroyed their city and state to the rest of the country. Fuck off California leftists and your fucking bullshit.

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IAN BIRRELL says tech giants have turned San Francisco into a dystopian nightmare of addiction, homelessness and criminality

- Criminals

"Zulu

Jones",

"Lefty

O'Douls

Boss",

"Shrimpb

oy Chow", "Francesco "Frank" Lanza", "Roger Boas", "James "Jimmy" Bronkema", "[Aladino](#) [Jimmy the Weasel](#) Fratianno"...the list of political mobsters in the San Francisco Bay Area goes on and on and on...



1 By [Ian Birrell for The Mail on Sunday](#)

2 Gilles Desaulniers moved to San Francisco 40 years ago, settling in the ‘friendly, quaint and  
3 affordable’ city after running out of cash while driving from **Canada** down the West Coast of  
4 America.

5 Today he runs a grocery store filled with fresh fruit, vegan snacks and organic wines typical of this  
6 famously liberal Californian city.

7 But Gilles has shut one outlet and would sell up entirely if anyone wanted this one, his  
8 remaining shop. Each day, up to 30 people stroll in and openly steal goods, costing him hundreds of  
9 dollars.

10  
11  
12  
13 A street cleaner showed me a box filled with used syringes that he had collected, then I met  
14 two charity workers picking up needles from the pavement. How many do you find a day, I ask?  
15 ‘Between 300 and 600, depending on the weather,’ one replies. A homeless man is pictured second  
16 left using a syringe to inject drugs in the city in June 2018

17  
18 He has been bitten twice recently by people in his shop and he also found a woman turning  
19 blue in the toilet after a drugs overdose, a hypodermic needle still stuck in her leg. He showed me a  
20 metal door that is corroding due to people urinating in his doorway, then spoke of finding a man  
21 relieving himself in full view of infants playing in a child centre next door. ‘Our society is falling  
22 apart,’ says Desaulniers. ‘If people do not play by some rules, society does not function. But it feels  
23 like there is no order, there is no shame.’ He uses two apocalyptic movies to illustrate the state of  
24 his adopted city: ‘Living here feels like A Clockwork Orange and Blade Runner have both come  
25 true.’

26 I could grasp his despair. I had just passed dealers selling drugs beside a police car parked outside  
27 government offices, and seen their customers openly smoke fentanyl, an opioid 50 times stronger  
28 than heroin, then collapse on the street.

- City ranks among worst tax-and-spend offenders...

Yet true to form, San Francisco has just elected as district attorney a radical called Chesa Boudin, whose parents were infamous militants from a far-Left, anti-war group. They were jailed for triple murder when Chesa was a toddler, leaving him to be adopted by the founders of the organisation

All cities have their seedy sides. But this is the very centre of San Francisco, by an upmarket Westfield shopping mall thronged with people in designer clothes perusing Rolex watches, Louis Vuitton handbags and Tiffany jewellery.

The beautiful city by the bay, where Tony Bennett famously left his heart and which poses as a beacon of progressiveness, has more billionaires per capita than any other on the planet.

Not long ago, a seven-bedroom home here recently sold for \$38 million (£29 million), while at the Michelin-starred Saison restaurant, the 'kitchen menu' starts at \$298 a head and reservations require a \$148 deposit.

The city authorities have a huge \$12 billion budget, handing their 31,800 staff average annual pay and benefit packages of an astonishing \$175,000.

Yet the tide of homeless, addicted and mentally ill people washing up here has become so severe that a global expert on slums claimed San Francisco may be more unsanitary than some of the poorest parts of Africa and Asia.

Oracle, one of the technology giants based in the nearby Silicon Valley, has switched a conference for 60,000 people to Las Vegas due to the toxic combination of 'poor street conditions' and costly hotels.

This followed a medical association moving its \$40 million convention out of San Francisco amid safety fears because of sordid tent encampments and overt drug use. Other events are being affected.

Indoors, people are making deals, talking about healthcare and networking. Yet in the streets, I witnessed homeless people injecting cocaine,' tweeted Kistein Monkhouse while attending a recent J. P. Morgan conference for 9,000 people.

As one prominent academic tells me, it seems a cruel irony that so much squalor and despair is



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1 found in the Californian base of all those billionaire technology titans seeking to reshape the world  
2 in their image.

3 'San Francisco has always had hobos but we've never seen anything like this. It's become a  
4 vision of some kind of strange dystopian future,' says Joel Kotkin, a widely respected professor in  
5 urban studies.

6 He can reel off damning statistics to back his claim that San Francisco symbolises the  
7 Golden State's descent into 'high-tech feudalism' including America's highest poverty levels, its  
8 worst rates of property crime and its biggest gap between top and middle incomes.

9 But one statistic stands out: almost half of homeless people in the United States are in  
10 California, according to a recent White House study.

11 And San Francisco, a comparatively small city that is home to tech giants such as Twitter,  
12 Uber and Airbnb, has the highest rate of 'unsheltered' citizens – at ten times the national level.

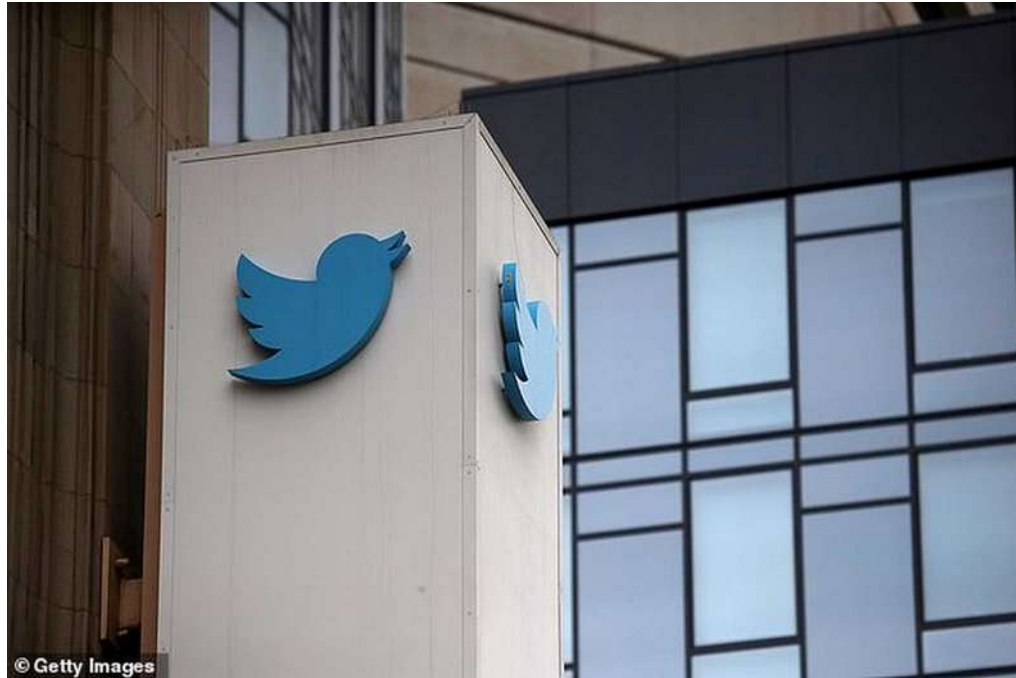
13 (The Horrors Of Living In San Francisco Cause Many To Jump Off The Golden Gate  
14 Bridge)

15 All cities have their seedy sides. But this is the very centre of San Francisco, by an upmarket  
16 Westfield shopping mall thronged with people in designer clothes perusing Rolex watches, Louis  
17 Vuitton handbags and Tiffany jewellery

18 Downtown visitors cannot fail to witness the distressing evidence. Almost instantly after I  
19 arrived, I saw three people smoking crystal meth through glass pipes, then others with the facial  
20 scabs and sores associated with this destructive drug. One man with matted hair sat slumped in a  
21 stupor wearing just grubby underpants.

22 Another, clearly under the influence of heroin, had 'nodded off' and was static on a child's  
23 bicycle. A third urinated on the street. A woman changed her clothes from a tatty suitcase on the  
24 pavement.

25 Others shuffled pathetically or rolled slowly along the street in wheelchairs. Some were  
26 clearly suffering mental distress, such as a man in his 50s begging for cash who told me he was  
27 waiting for his air force pension. A street cleaner showed me a box filled with used syringes that he  
28 had collected, then I met two charity workers picking up needles from the pavement.



Ho

w many do you find a day, I ask? 'Between 300 and 600, depending on the weather,' one replies. So if you are going to San Francisco, feel free to wear flowers in your hair but local women say avoid sandals on your feet. Dog owners complain they have to wash human faeces from the legs of their pets after a walk. One fed-up resident showed me Hondurans handing out socks filled with wraps of drugs in front of a building being turned into an upmarket Whole Foods store. The dealers displayed little need for concealment. 'After a while, you become desensitised – it's like everyone here is wearing blinkers,' says my guide, a man in his 30s. 'All my friends with kids have moved out of the city.'

The city and state have some of the highest tax rates in the country, but his area of SoMa West voted to back a fresh charge on firms to fund a new community group to clean up its streets. It is the 17th district to pass such a measure.

'You have to develop a thick skin,' says Sonya Lee, 24, supervisor in a Starbucks branch surrounded by bustling boutiques, expensive hotels and smart restaurants. 'Every day, people come in and take stuff. It's dreadful but we don't know what to do.'

(Twitter's sick perverted staff attract naive young drug users and sex deviants)

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1 San Francisco, a comparatively small city that is home to tech giants such as Twitter, Uber  
2 and Airbnb, has the highest rate of ‘unsheltered’ citizens – at ten times the national level. Official  
3 data, based on one night’s count last year, claimed 8,011 homeless people in this city of 884,000  
4 people – a rise of 17 per cent on 2017. But a record of those receiving healthcare found numbers  
5 twice as high and rising faster. City authorities claim their key problem is the high cost of housing  
6 combined with past failures to build enough properties. But many blame something simpler to  
7 solve: the lack of law enforcement.

8 ‘When you tell vagrants that anything goes, it leads to the anarchy you see on these streets,’  
9 says Heather MacDonald, a fellow at the Manhattan Institute think-tank and a conservative  
10 essayist. She believes we are witnessing a ‘real-life experiment’ into what happens if society stops  
11 enforcing bourgeois norms out of sensitivity to vulnerable people. MacDonald argues that the city  
12 authorities are culpable, fuelling drug addiction by doling out 4.5 million needles a year when there  
13 is nothing compassionate about giving addicts and mentally ill people the freedom to ‘decompose’  
14 on the streets.

15 Much of what she says is backed by Thomas Wolf, 49, who lost his job and family after  
16 becoming addicted to opioid painkillers following foot surgery, then moving on to cheaper heroin  
17 and ending up homeless in his native city. ‘It is a cycle of despair,’ he says. ‘I was heartbroken at  
18 losing my wife and kids but all I cared about was drugs. I hated being on the streets but I loved the  
19 easy access to drugs. ‘Yet there’s such denial that if you’d have asked me if I had a problem, I’d  
20 have said no.’

21 Wolf, who now works for the Salvation Army helping homeless people rebuild lives and  
22 has just been appointed to a specialist civic taskforce, sees untreated addiction as the root cause of  
23 the city’s problem. He says most people living on the streets are hooked on either drugs or drink.

24 ‘If you see someone shouting at the wall, it is crystal meth, not mental illness – although  
25 meth might have destroyed their mind.’ Wolf claims that while the city distributes drug  
26 paraphernalia, he was never asked to quit or offered help. He says many users sell their monthly  
27 welfare \$190 food stamps on receipt to go on a binge. And he wants to see generous welfare  
28 benefits – almost \$600 a month in return for 12 hours of voluntary work – slashed. His own time as

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1 a homeless heroin addict ended after police caught him holding six socks filled with drugs for  
2 Honduran dealers. His brother bailed him from jail on condition that he went into rehab. He was  
3 lucky. Last year there were 234 deaths from fentanyl and heroin in the city, more than double the  
4 previous year and five times higher than in 2016.



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16 olf believes that the decision by a state ballot six years ago to reclassify thefts of property below the  
17 value of \$950 as misdemeanours has backfired badly, leading to a huge increase in shoplifting. 'It is  
18 a disaster,' he says. 'The idea was sound – to reduce jailing that is predominantly of minorities – but  
19 the side effect was to embolden people to commit crime with impunity. Everyone knows you can go  
20 into shops and steal up to \$950.' Even shampoo, deodorant and toothpaste are now locked up in  
21 chemist shops to curb thefts. The police declined to speak officially. But one officer sitting in his  
22 car beside blatant street-dealing said there was no point arresting people as they would simply be  
23 released, even if they were carrying drugs and cash valued at several thousand dollars. 'I find it very  
24 frustrating and lots of my colleagues find it very frustrating,' he says, adding that officers only  
25 intervene when there is violence. 'We get the blame because people think we're doing nothing. But  
26 it's not our fault.' Wes Tyler, manager of a family-owned hotel, told me a man high on crystal meth  
27 smashed a \$5,000 window one Sunday afternoon – then repeatedly ignored court dates and  
28 probation orders despite being seen in the neighbourhood last week.

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1 'If City Hall does not start to take these issues more seriously, we'll see businesses  
2 impacted,' says Jay Cheng, spokesman for the local Chamber of Commerce. Yet true to form, San  
3 Francisco has just elected as district attorney a radical called Chesa Boudin, whose parents were  
4 infamous militants from a far-Left, anti-war group. They were jailed for triple murder when Chesa  
5 was a toddler, leaving him to be adopted by the founders of the organisation.

6  
7 The beautiful city by the bay, where Tony Bennett famously left his heart and which poses  
8 as a beacon of progressiveness, has more billionaires per capita than any other on the planet. Not  
9 long ago, a seven-bedroom home here recently sold for \$38 million (£29 million), while at the  
10 Michelin-starred Saison restaurant, the 'kitchen menu' starts at \$298 a head and reservations require  
11 a \$148 deposit. The 39-year-old, who studied at Oxford University as a Rhodes scholar and later  
12 worked as a translator for Venezuela's former leader Hugo Chavez, a Fidel Castro acolyte,  
13 campaigned on moving away from prosecuting 'quality of life' offences to focus on serious and  
14 corporate offences.

15 The San Francisco Police Officers Association spent heavily campaigning against Boudin,  
16 saying he was the choice for 'criminals and gang members'.

17 But Jennifer Friedenbach, executive director of the charity Coalition on Homelessness,  
18 argues city residents should get angry over 'systemic neglect' that sparked this crisis rather than  
19 blaming people on the streets. 'No one wants to live like this,' she says. 'We've tried locking people  
20 up before but that didn't work.' Friedenbach insists that the problems stem from a lack of affordable  
21 housing, a significant reduction of emergency shelters and the slashing of spending on treatment  
22 programmes.

23 She says, rightly, that issues of homelessness, mental health and addiction are often linked.  
24 The city's mayor, London Breed, whose younger sister died of a drug overdose and elder brother  
25 was jailed for robbery, declined to comment.

26 In her inaugural speech, Breed said the 'twin troubles of homelessness and housing affordability'  
27 were the big challenge. She is boosting grants for shelters, treatment and street cleaning. Yet those  
28 desperate sights staining this one-time hippy nirvana are ultimately the sign of abject political

1 failure. Her new fiefdom is, after all, so populated by millionaires in their exclusive enclaves that it  
2 is the second richest city in the world's richest nation. Considering the city's wealth, it smacks of  
3 callous and uncaring hypocrisy. As one local resident says: 'Are they really being progressive to  
4 that poor guy in the street with a needle in his arm who is going to die tomorrow?'

5 [John Gabriel: California Is A Failed State; How Do We Know? They're Moving To Arizona](#)  
6 [In Drovers](#)

7  
8 SAN FRANCISCO TURNS INTO SOCIAL HELL-SCAPE AS CORRUPTION HAS  
9 MADE EVERYTHING IN SF COST TWICE AS MUCH AS THE REST OF AMERICA

10 [\(LINK\) Median price for Bay Area home hits record-shattering \\$935,000...](#)

11 [\(LINK\) Woman allegedly calls cops on girl selling water in San Fran...](#)

12 [\(LINK\) Gay Tech Mafia runs Silicon Valley and San Francisco](#)

13 [Meanwhile on the West Coast... Downtown San Francisco Littered with Drug Needles,](#)  
14 [Piles of Feces](#)

15 [Diseased Streets: San Francisco Spends \\$30 Million Cleaning Feces, Needles. City](#)  
16 ["among some of the worst slums in the world." \(nbcbayarea.com\)](#)

17 [When people refuse to navigate piles of human shit to get food, San Francisco has the](#)  
18 [answer - BAN company owned cafeterias to "protect" local](#)  
19 [restaurants. \(m.washingtontimes.com\)](#)

20  
21 [San Fran Diseased Streets... Needles, Garbage, Feces... Like Worst Slums in World...](#)

22 San Francisco mayor admits she was screwing corruption boss and took thousands of dollars  
23 of cash from top crook in FBI corruption probe

24 **SF = Corruption**

25 By [Brie Stimson](#)

26 •

27 [San Francisco](#) Mayor London Breed on Friday admitted having a 20-year friendship and  
28 brief romantic relationship with a former city worker now under [FBI](#) investigation, prompting some

1 to call for her resignation.

2 **San Francisco Is One Of The Most Corrupt Cities In The World**

3 San Francisco Mayors, Area Senators and Supervisors exist off of bribes. Facebook, Google,  
4 Twitter, Tesla, Chevron, Wells Fargo, Real Estate developers and Chinese mobsters are the biggest  
5 payers of bribes. They pay in cash, hookers, buildings, stock warrants and election manipulation.  
6 San Francisco politicians pretend to be "green" but they only care about Green Cash. They pretend  
7 to be a "Sanctuary City" but all they care about is harboring criminals who they can use to puff up  
8 voter counts.

9 San Francisco cares about one thing: CASH!

10 If there is a second thing they care about it is: PRETENTIOUS LIFESTYLES

11 Chicago is corrupt because of the mafia and gangster culture it supports. San Francisco is  
12 corrupt because it has no moral compass except the arrow that points straight to hell. Greed and  
13 power rule all decisions in San Francisco politics.

14  
15 ['Corrupt in its roots': as Oakland police scandals pile up ...](#)

16 May 21, 2016 · Donald Trump may have called the city one of the 'most dangerous' in  
17 the world, ... 'Corrupt in its roots': as ... the city across the bay from San Francisco ...

18 <https://www.theguardian.com/us-news/2016/may/21/oakland-police-miscon...>

19  
20 [Report on the Causes of Municipal Corruption ... - San Francisco](#)

21 Report on the Causes of Municipal Corruption in San Francisco, ... No one of the many  
22 persons we have ... "The undersigned of the City of San Francisco, ...

23 [S.F. sfmuseum.org/hist5/graft1.html](http://sf.sfmuseum.org/hist5/graft1.html)

24 <http://www.freewebs.com/boycottsanfrancisco/>

25  
26 [SSF Lawmaker Urges Charges In Corruption Probe: OP-ED](#)

27 South San Francisco, CA - Several local lawmakers including State Senator Jerry Hill are  
28 urging the state AG to file charges in a CPUC corruption probe.



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[CORRUPTION CENTRAL: PETER P. McDONOUGH - FoundSF](#)

CORRUPTION CENTRAL: PETER P. McDONOUGH. ... San Francisco History ... from  
FOUNTAINHEAD OF CORRUPTION: Peter P. McDonough, Boss of San Francisco's Underworld  
by ...

[foundsf.org/index.php?title=CORRUPTION\\_CENTRAL:\\_PETER...](https://foundsf.org/index.php?title=CORRUPTION_CENTRAL:_PETER...)

[San Francisco city employees in court facing public ...](#)

Two former San Francisco city officials and a longtime city staffer appeared in court on  
Friday, facing public corruption charges.

[abc7news.com/politics/sf-city-employees-in-court-facin.](https://abc7news.com/politics/sf-city-employees-in-court-facin.)

[Are corrupt politicians the cause of sky-high San Francisco ...](#)

Are corrupt politicians the cause of sky-high San Francisco ... What is the most corrupt city  
agency in San Francisco? ... effect on San Francisco real estate. No one ...

[Qhttps://www.quora.com/Are-corrupt-politicians-the-cause-of-sky-](https://www.quora.com/Are-corrupt-politicians-the-cause-of-sky-)

[California state Sen. Yee arrested in corruption case - SFGate](#)

The former San Francisco school board member, ... He was reportedly arrested on  
public corruption charges Wednesday morning amid raids of his office in Sacramento and ...

[San Francisco corruption probe ensnares six current or ... - CNN](#)

Five San Francisco police officers and one former cop were indicted Thursday by federal  
grand juries in connection with a corruption investigation.

[cnn.com/2014/02/27/justice/san-francisco-police-c...](https://cnn.com/2014/02/27/justice/san-francisco-police-c...)

[San Francisco Corruption: Mayor, prosecutor, gangster Shrimp ...](#)

San Francisco Mayor Ed Lee, seen here in 2011, is accused in a new court filing of using  
officials in his adminsitration to collect bribes. Photo by Justin ...

[slate.com/blogs/the\\_slatest/2015/08/04/san\\_francisc...](https://slate.com/blogs/the_slatest/2015/08/04/san_francisc...)

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Who might be next? San Francisco's long-running political ...

He cited a San Francisco prosecution a ... Gascon's words that day provided the first hint that a long-running political corruption probe here might not be over ...

 [latimes.com/local/california/la-me-sf-probe-20160225-...](https://www.latimes.com/local/california/la-me-sf-probe-20160225-...)

San Francisco police corruption investigation ... - Fox News

The San Francisco police chief is seeking to fire eight officers and discipline six others involved in a racist texting scandal.

[foxnews.com/us/2015/05/15/san-francisco-police-corruption...](https://www.foxnews.com/us/2015/05/15/san-francisco-police-corruption-...)

3 San Francisco city officials may face trial on corruption ...

First a Chinatown gangster dubbed Shrimp Boy and state Senator Leland Yee were both nabbed in a federal corruption sting. Now three others who were also targets of ...

[abc7news.com/3-sf-city-officials-may-face-trial-on-cor...](https://abc7news.com/3-sf-city-officials-may-face-trial-on-corruption-...)

[How to fix San Francisco's corruption problem - by b. stuart ...](#)

Corruption. It's as San Francisco as fog, organic produce and good weed. And by that I mean, it's such a part of the culture here that we take it for granted

**San Francisco's Homeless Encampments expose The Failure Of A Liberal Utopia**

By **John Daniel Davidson**

**San Francisco Is Now The Most Rapidly Failing City In America**

In America's most liberal city, increasingly visible homeless camps are a stark symbol of San Francisco's economic hollowing out and the failure of progressive governance.

SAN FRANCISCO – “You want the down-low? I’ll give you the down-low: Gavin Newsom and his pearl-clutching elitists from Pacific Heights only do things that profit themselves!

These guys will all tell you something different, but the one thing everyone here has in common is that they all do drugs.”

I’m talking to a group of homeless men camped out under Highway 101 in San Francisco’s Mission

1 neighborhood, where a half-dozen tents are set up on a wide sidewalk across the street from a Best  
2 Buy. The thirty something guy who's telling me it's all about drugs doesn't want to give me his  
3 name.

4 -----  
5 **Shit-Hole San Francisco — where drug addicts outnumber high school students**

6 Officer Brian Donohue checks on Jeffrey Choate after he sees him lying on the sidewalk  
7 along Larkin Street and asks him to dispose of used needles next to him in a proper container on  
8 Monday, September 10, 2018 in

9  
10 San Francisco has more drug addicts than it has students enrolled in its public high schools, the city  
11 Health Department's latest estimates conclude.

12  
13 There are about 24,500 injection drug users in San Francisco — that's about 8,500 more people  
14 than the nearly 16,000 students enrolled in San Francisco Unified School District's 15 high schools  
15 and illustrates the scope of the problem on the city's streets.

16  
17 It's also an increase of about 2,000 serious drug users since 2012, the last time a study was done.

18  
19 "There is an opioid epidemic in this country, and San Francisco is no exception," Deputy Director  
20 of Health Dr. Naveena Bobba said.

21  
22 The problem is particularly visible in the Tenderloin, where police reported more than 600 arrests  
23 for drug dealing last year. And where 27 suspects were booked into County Jail for dealing drugs in  
24 the first 20 days of the new year.

25  
26 The out-in-the-open use of drugs on city sidewalks and at the Civic Center BART Station was a  
27 huge embarrassment for the city and triggered more police patrols and crackdowns in the past year.  
28 The BART station has been cleaned up, but the problem continues in the Tenderloin.

1  
2 And while the police stay busy targeting dealers — the criminal side of illegal drugs — the city’s  
3 public health officials work the problem as a health crisis.

4 -----  
5 **CRONY POLITICS RULE SAN FRANCISCO**

6 The San Francisco Board of Supervisors voted 7-4 on Tuesday to overturn the 2015 sale of  
7 Presidio Terrace, a privately-owned street in the neighborhood of the same name used by a few  
8 dozen of the city’s wealthiest homeowners, faulting the city’s tax collector and not the residents for  
9 letting an annual \$14 tax bill go unpaid for decades.

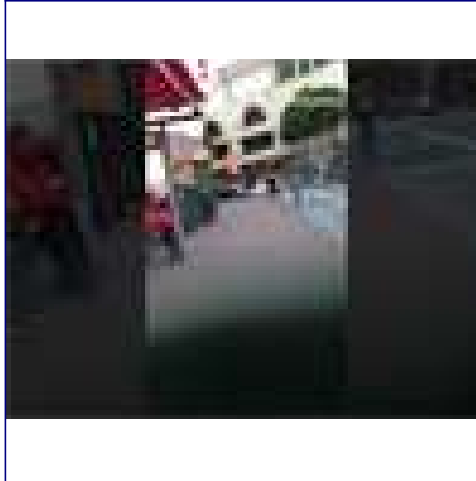
10 Supervisor Mark Farrell, whose district includes Presidio Terrace, scheduled Tuesday’s hearing in  
11 August, allegedly to “get to the bottom” of the dispute and let all parties plead their case.

12 A South Bay couple bought Presidio Terrace’s circular street and accompanying sidewalks at a tax  
13 sale to the tune of \$90,000 after the Presidio Terrace Association (PTA) had failed to pay the taxes  
14 on their avenue for 30 years.



Residents are  
FLEEING Sanctuary City  
San Francisco at a RECORD  
RATE!(youtube.com)

SAN FRANCISCO  
HAS TURNED INTO THE  
BIGGEST SHIT-HOLE  
CITY IN AMERICA



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[Typical San Francisco street fight \(youtube.com\)](#)

by [gnexus](#) to [videos](#) (+23|-0)

- [comments](#)

[Commiefornia - Colin Flaherty: San Francisco Techies Surprised by the Level of Black Violence \(hooktube.com\)](#)  
[comments](#)

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**SAN FRANCISCO BAY AREA VENTURE CAPITALISTS PROVE THEIR  
CORRUPTION RUNS DEEP**

The founder of a Silicon Valley venture capital firm was sentenced Wednesday to six months behind bars for paying about \$450,000 in bribes to boost his two daughters' entrance exam scores and get one of them into Georgetown University as a bogus tennis recruit.

Manuel Henriquez, the 57-year-old founder and ex-CEO of Hercules Capital based in Palo Alto, California, cried and dabbed his eyes with a tissue as he prayed for forgiveness from his children and other families he hurt, and asked the judge for mercy.

“There is no perfect way to express how broken I feel in my heart and soul,” said Henriquez, who sat next to his lawyer and wore a face mask for much of the hearing held via video conference

1 because of the coronavirus pandemic.

2 His wife, Elizabeth Henriquez, was sentenced in March to seven months behind bars. She is  
3 currently locked up at a prison in California and is expected to be released in January, according to  
4 online records.

5 Prosecutors had asked for five months for Manuel Henriquez, calling him in court  
6 documents a “less active participant in the mechanics of the fraud than his wife.” The defense urged  
7 the judge for three months or less.

8 U.S. District Judge Nathaniel Gorton called Henriquez a hypocrite who donated money to  
9 aid children, while at the same time using his wealth and privilege to put his kids ahead of other less  
10 fortunate students in the college admissions process.

11 “It’s a sad day,” the judge said.

12 **[How San Francisco's Wealthiest Families Launched Kamala ..](#)**

13 A high-school senior had deftly promoted her “brand” for the Ivy League, a college  
14 consultant boasted. In a 2013 promotional video, William Rick Singer, the mastermind of an  
15 elaborate admissions corruption scheme, showered praises on the young woman.

16 She’d started her own organization to fight climate change, he said. She’d eventually enroll  
17 in Brown. That student, it turns out, was Mary Doerr, a daughter of John Doerr, the Silicon Valley  
18 venture capitalist and early backer of Google and Amazon.

19 The Doerrs were clients of Singer years before he turned a legitimate college consulting  
20 practice into an elaborate bribery-for-admissions scheme that has shaken American academia, the  
21 parents who sought Singer’s advice and the Wall Street and Silicon Valley firms that are now  
22 dealing with the fallout.

23 Pro golfer Phil Mickelson and National Football League Hall of Fame quarterback Joe  
24 Montana each tweeted last week that their families had used Singer for college consulting and were  
25 “shocked” to hear about the illegal activity.

26 So are some of the Wall Street and Silicon Valley companies who had connections to  
27 Singer, including Goldman Sachs Group Inc., bond-giant PIMCO and venture-capital firm Kleiner  
28 Perkins Caulfield & Byers, which Doerr co-founded and is chairman.

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1 Court papers suggest as many as 800 families hired Singer at some point. Singer ran an  
2 apparently legitimate college counseling firm, the Edge College & Career Network, before about  
3 2011. The 2013 promotional video that referred to Mary Doerr says she was a client “six years  
4 ago,” or about 2007. The bribery case reaches back only to 2011.

5 The Doerr family has not been accused of any wrongdoing. Mary Doerr graduated from Brown  
6 University in 2015 and now is a graduate student at North Carolina State University, according to  
7 her LinkedIn profile.

8 Calls to Mary Doerr and her mother, Anne, were not returned. A Kleiner Perkins  
9 spokeswoman, Katie Hutchison, didn’t respond to a request to speak with John Doerr.  
10 Hutchison declined to answer questions but said in a written statement that while Doerr and partner  
11 Tom Schlein, “along with a long list of Valley luminaries,” were clients of Singer, they consulted  
12 him only for “test tutoring and help with college applications — typical of services provided by  
13 thousands of private college counselors across the country — and nothing further.”  
14 Goldman Sachs, which was mentioned in a wiretapped phone conversation as a social connection  
15 for at least one of the parents charged in Singer’s bribery-for-admissions scheme, says it has begun  
16 an internal investigation into any connection its employees may have to the former college  
17 consultant.

18 Firms whose partners and employees were caught up in the federal case known as  
19 “Operation Varsity Blues” have swiftly moved to fire or accept the resignations of people involved.  
20 Bond-giant PIMCO said in a statement on Monday that “as part of a regular series that includes  
21 dozens of outside speakers, PIMCO invited Mr. Singer to speak twice over the past decade, the  
22 latest in 2015, about the college admissions process.” But the firm added that it “has never had a  
23 business relationship with Rick Singer or his college preparation organization. Neither PIMCO nor  
24 the PIMCO Foundation has ever paid Mr. Singer or donated money to his foundation.”

25 The statement added that any employees who engaged with Singer’s illegal scheme “would  
26 have no place at the firm.”

27 PIMCO’s former chief executive Douglas Hodge, who retired in 2017, is accused of paying  
28 about \$500,000 in bribes for two daughters and a son to be admitted to Georgetown University and



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1 and the University of Southern California as fake tennis, soccer and football recruits.

2 The case has also sent shivers among affluent parents who fear they and their children will  
3 be tarnished as the Singer case unfolds.

4 Families now in the admissions process “want to illustrate that they’re a good family that  
5 wouldn’t cheat and that their kids would never want them to cheat the process,” said Christine  
6 Pluta, a private counselor with Edvise Princeton who has also worked in the admissions offices of  
7 the University of Pennsylvania and Barnard College. “I have never before heard a family try to  
8 convince me of their own integrity. Singer is part of the conversation.”

9 Pluta said when she worked at Penn about 20 years ago, a “father offered me a million  
10 dollars if his daughter would be admitted. At first I thought he was joking.” She said she made it  
11 clear the offer was inappropriate.

12 Singer cooperated with authorities and pleaded guilty to facilitating more than \$25 million in  
13 bribes for faked ACT and SAT scores and bogus athletic profiles to schools including the  
14 USC, Georgetown and Yale University. Parents contributed to Singer’s fake charity, Key Worldwide  
15 Foundation, to facilitate bribes to coaches and school officials and some and some took the  
16 charitable-donation deduction.

17 The wealthy parents worked in finance, sports and entertainment and included actresses Lori  
18 Loughlin and Felicity Huffman as well as Hodge, who was replaced as CEO of PIMCO in 2016;  
19 Gordon Caplan, the co-chairman of global law firm Wilkie Farr & Gallagher LLP, and William  
20 McGlashan Jr., a former partner of private equity firm TPG, who was fired last week.  
21 The relationships in those worlds led to some embarrassing revelations for firms who invited Singer  
22 to speak.

23 “We know people at Goldman Sachs who have, you know, recommended you highly,” said  
24 parent Marci Palatella, according to transcripts of a wiretapped conversation with Singer.  
25 Palatella, chief executive officer of a liquor distribution company in Burlingame, Calif., and the  
26 wife of former San Francisco 49ers player Lou Palatella, was charged with paying \$575,000 in  
27 bribes to get their son into USC as a fake “long snapper” football recruit.

28 Goldman Sachs spokesman Patrick Scanlan said Monday that “we’re continuing to look into

1 the matter.”

2 Another parent charged in the scandal referenced Kleiner Perkins. In a wiretapped  
3 conversation, parent Bruce Isackson worried that the Internal Revenue Service might discover the  
4 bogus charity, to which Isackson is accused of paying hundreds of thousands of dollars in bribes to  
5 get his daughter into USC as a fake-recruited rower.

6 Isackson, who was president of real-estate development firm WP Investments in Woodside,  
7 Calif., was charged along with his wife, Davina. He no longer appears on the website of the firm,  
8 which didn’t respond to calls.

9 “Is this gonna be this — be the front page story with everyone from Kleiner Perkins do  
10 whatever, getting these kids into school,” Isackson said according to the transcript.

11 In the 2013 promotional video, Singer spoke of an unnamed client who had started  
12 Inconvenient Youth while in high school. “She got totally engaged in her brand, in her story, in her  
13 passion,” he said in the short video, adding that “I had her six years ago as a student” and thanking  
14 former Vice President Al Gore for allowing “us” to use his slide show from his 2006 documentary,  
15 “An Inconvenient Truth,” that inspired Doerr’s group.

16 Singer added that getting in to college “has to do with getting involved in your brand.” He  
17 highlighted his role in Mary Doerr’s venture, saying that “we wanted to create an organization that  
18 would focus on global warming for youth.”

19 Mary Doerr started Inconvenient Youth in 2008 between her junior and senior years  
20 atCastilleja School in Palo Alto, Calif.

21 John Doerr, whose net worth Forbes puts at \$7.5 billion, has been involved in education  
22 issues for some time. He is co-founder and lifetime director of the NewS chools Venture Fund,  
23 which invests in start-ups aimed at improving public education. He and Anne Doerr donated \$50  
24 million in 2015 to Rice University, his alma mater, to finance a leadership training program.  
25 The couple paid about \$50,000 bribes to have someone cheat multiple times on standardized tests  
26 for their daughters, authorities said.

27 The Henriquezes were also charged with paying \$400,000 to the sham charity run by  
28 admissions consultant Rick Singer to get their oldest daughter into Georgetown by falsely

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1 portraying her as a star tennis player. Singer in turn paid then-Georgetown tennis coach Gordon  
2 Ernst in exchange for labeling her as a recruit, authorities say.

3 Ernst, who's accused of getting nearly \$3 million in bribes, has pleaded not guilty.

4 Singer has pleaded guilty to running the sprawling bribery scheme and helped investigators  
5 build the case against the parents.

6 Henriquez's lawyers said in court documents that his participation in the scheme was "minor  
7 and largely passive" as he was busy running his company while his wife "devoted herself to the care  
8 and well-being of their children."

9 "Mr. Henriquez knew some but not all of the details of the scheme with Singer, played a  
10 small role, and to his great regret and shame, did not stop it. He paid Singer's bills, as he did all the  
11 family's bills," his lawyers said in a court filing.

12 Assistant U.S. Attorney Eric Rosen said it "strains credulity" that Henriquez would believe  
13 that the \$400,000 payment to Singer's sham charity would support "underfunded college athletic  
14 programs (including Georgetown tennis) and programs for disadvantaged youth," as his attorneys  
15 claimed in court documents.

16 Rosen accused Henriquez of refusing to fully accept responsibility for his actions and  
17 attempting to present a "sanitized version of the conduct to the court."

18 The Henriquezes are among nearly 30 parents who've admitted to charges in the massive  
19 case called "Operation Varsity Blues."

20 "Full House" star Lori Loughlin and her fashion designer husband, Mossimo Giannulli, are  
21 scheduled to be sentenced in August after pleading guilty to paying half a million dollars to get their  
22 two daughters into the University of Southern California as fake crew recruits. Loughlin's plea deal  
23 calls for her to serve two months behind bars and Giannulli's calls for him to serve five months.

24 **THE HORRIFIC CORRUPTION OF GAVIN NEWSOM**

25  
26 [Is Gavin Newsom Totally Corrupt or Just Eternally ...](https://www.capoliticalreview.com/capoliticalnewsandviews/is-gavin-newsom-totally-corrupt-or-just-eternally-incompetent/)

27 [www.capoliticalreview.com/capoliticalnewsandviews/is-gavin-newsom-totally-corrupt-](https://www.capoliticalreview.com/capoliticalnewsandviews/is-gavin-newsom-totally-corrupt-or-just-eternally-incompetent/)  
28 [or-just-eternally-incompetent/](https://www.capoliticalreview.com/capoliticalnewsandviews/is-gavin-newsom-totally-corrupt-or-just-eternally-incompetent/)

**Corruption**, Incompetent, Supreme Leader **Gavin Newsom** is way over his head. Either the Legislature take back the reins of government—or the Feds should stop giving California money until those responsible are either out of office or indicted. What do you think? A politically connected firm gets an \$800-million mask contract with California.

[Red State: CORRUPTION. Gavin Newsom Got a Free Mansion and ...](#)

[!\[\]\(e78f798d4ea5c530c9db49e7d26e6b95\_img.jpg\)https://rightondaily.com/2020/07/red-state-corruption-gavin-newsom-got-a-free-mansion-and-other-perks-not-reported-on-his-financials/](https://rightondaily.com/2020/07/red-state-corruption-gavin-newsom-got-a-free-mansion-and-other-perks-not-reported-on-his-financials/)

**Gavin Newsom's** \$3.7 million, 12,000 square foot mansion, on 8+ acres along the American River in Sacramento, was the area's most expensive home sale in 2018. The gated estate consists of a 6 bedroom/10 bath home, a guest house, a pool, a tennis court, and a wine cave.

[The idiocy, ignorance, and corruption of California's ...](#)

[!\[\]\(ec9132f1d27c8919987d92907322654d\_img.jpg\)https://behindtheblack.com/behind-the-black/essays-and-commentaries/the-idiocy-ignorance-and-corruption-of-californias-governor-newsom/](https://behindtheblack.com/behind-the-black/essays-and-commentaries/the-idiocy-ignorance-and-corruption-of-californias-governor-newsom/)

In the past week the Democratic governor of California, **Gavin Newsom**, has demonstrated that in his quest to cement the dictatorial powers he gave to himself with the arrival of the Wuhan virus, he really has no interest in any facts or real scientific data.

[BREAKING: TREASON: GA Gov. Kemp and CA Gov. Newsom bought ...](#)

[!\[\]\(dd161862f9164df98f62b726e9846241\_img.jpg\)https://channel411news.com/2020/11/24/breaking-treason-ga-gov-kemp-and-ca-gov-newsom-bought-off-by-communist-china-in-covid-supplies-kickback-and-money-laundering-schemes-source/](https://channel411news.com/2020/11/24/breaking-treason-ga-gov-kemp-and-ca-gov-newsom-bought-off-by-communist-china-in-covid-supplies-kickback-and-money-laundering-schemes-source/)

In July of this year, Natural News reported how California Gov. **Gavin Newsom** was caught wiring half a billion dollars to communist China as part of a "massive face mask money laundering scheme."

[Gavin Newsom caught wiring half a ... - Corruption News](#)

[!\[\]\(626ce8ac21792b9405bfddfea8e0c96a\_img.jpg\)https://corruption.news/2020-07-07-newsom-wired-half-billion-communist-china-face-mask-money-laundering.html](https://corruption.news/2020-07-07-newsom-wired-half-billion-communist-china-face-mask-money-laundering.html)

The sordid details of California Governor **Gavin Newsom's** unwholesome dealings with communist China continue to emerge, including the shocking revelation that **Newsom** is quietly

1 funneling hundreds of millions of taxpayer dollars to the communist Chinese regime in exchange  
2 for political favors.

3 [Recall Gavin Newsom Campaign Hits Back at California ...](#)

4 [Nhttps://www.newsweek.com/recall-gavin-newsom-campaign-hits-back-100m-claim-  
5 1565397](https://www.newsweek.com/recall-gavin-newsom-campaign-hits-back-100m-claim-1565397)

6 "If it costs 100 million tax dollars to #RecallGavin2020, we could have  
7 recalled **Gavin Newsom** 300 times with the money lost to [Employment Development  
8 Department] **corruption** and unemployment scams!"

9 [Governor Newsom's Dubious Mask Deal Brings Corruption ...](#)

10 [https://www.sandiegonewsdesk.com/2020/06/governor-newsoms-dubious-mask-deal-  
11 brings-corruption-concerns/](https://www.sandiegonewsdesk.com/2020/06/governor-newsoms-dubious-mask-deal-brings-corruption-concerns/)

12 Gov. **Gavin Newsom** made a \$1.4 billion deal with BYD, a Chinese company, to produce  
13 N-95 masks. What's weird about this situation is that BYD is an electric bus maker with no history  
14 of making masks. What's even weirder is that the masks never came to fruition because they failed  
15 to meet national safety and health standards.

16 [Project Packs a Sweetheart Deal for No-Bid Willie Brown Crony](#)

17  
18 [Newsom Recall Petition Reaches 1.5 Million Signatures](#)

19  
20 [Cronyism is the Governing Principle of California](#)

- 21
- 22 • [California Corruption: Crony Socialism, Corruption](#)
  - 23
  - 24 • [Gavin Newsom Netted Millions \(Tax-Free\) In Undisclosed "Sweetheart"](#)
  - 25 [Loans](#)
  - 26

27 SAN FRANCISCO NOW THE #1 PLACE IN AMERICA TO GET AN AWFUL SEX  
28 DISEASE!

[STDs in California reach all-time high: 300,000 cases...](#)

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[SAN FRANCISCO Gives ILLEGAL ALIENS Right To Vote in order to try to jam up elections \\*](#)

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[San Fran: Not Only Do the Politics Smell](#)

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**SEE THE STORY OF MURDER THAT CREATED A WELL-PLACED MAYOR FOR THE TECH CARTEL:**

[Darkened Corridors: THE DARKEST STORY OF SILICON VALLEY CORRUPTION THE SILICON VALLEY TECH MAFIA.pdf \(LINK\)](#)

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[Home Prices In 80% Of US Cities Grew 2x Faster Than Wages... And Then There Is San Francisco](#)

The mayor of San Francisco says he's hiring 10 workers whose sole responsibility will be to clean up the massive numbers of drug needles littering the streets.

San Francisco Mayor Mark Farrell said Monday the team will respond to resident complaints and remove needles and syringes from "hot spots" every day of the week.

Farrell tells the [San Francisco Examiner](#) that discarded syringes on the streets are among the top litter complaints in the city with a growing homelessness problem and a devotion to encouraging hippie scum to live there.

<http://nbclosangeles.com/news/california/San-Francisco-to-Hire-Needle-Cleanup-Team-480616941.html>

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**San Francisco Forensic Investigator Paul Kangas Keeps The Ruling Elite On Their Toes**

Don't do crime with public money in front of Paul Kangas. This modern Sam Spade will

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1 latch onto the case like a pit-bull and never let go. If City Hall, Silicon Valley or the Opera Crowd  
2 get into bribery, corruption, sex trafficking and other dirty bits, Paul might end up on their heels.

3  
4 As the former guard for President Kennedy, Paul Kangas is now a private Investigator in California.  
5 His seminal article on the role of George HW Bush in the assassination of JFK was just published  
6 on the front page of the Cuban newspaper, Granma. 30 million copies were distributed worldwide.  
7 He has taught, and inspired, many contemporary media investigators who have over-turned the  
8 entire news industry with the kinds of FBI-class public research that Kangas uses. The many  
9 "citizen sleuth' groups operating around the world were inspired by the early work of Kangas. Paul  
10 Kangas has busted up more corruption in San Francisco than the last 4 police bosses in San  
11 Francisco. You don't always know that he did it, but suddenly a package of investigation data shows  
12 up at the right reporter's desk at the right time and that public official is "gone:.

13 Kangas is said to have copies of all of the files left behind when Clinton private eye: Jack  
14 Palladino, died. Paul Kangas is the last guy on Earth that any corrupt politicians should consider  
15 screwing with!

16  
17 [Paul Kangas - Ballotpedia](https://ballotpedia.org/Paul_Kangas)

18 [https://ballotpedia.org/Paul\\_Kangas](https://ballotpedia.org/Paul_Kangas)

19 **Paul Kangas** (Democratic Party) ran for election for President of the United  
20 States. **Kangas** lost as a write-in in the Democratic convention on August 18, 2020. **Kangas** also  
21 ran for election to the **San Francisco** Unified Board of Education in California. **Kangas** lost in the  
22 general election on November 3, 2020.

23 [DR. PAUL KANGAS, JD, PhD | San Francisco Voter Guide](https://voterguide.sfelections.org/en/dr-paul-kangas-jd-phd)

24 <https://voterguide.sfelections.org/en/dr-paul-kangas-jd-phd>

25 My occupation is Criminal Defense Investigator.. My qualifications are: Dr. **Paul Kangas**,  
26 JD, PhD. SF can raise teacher pay, to \$100K, by putting 1,000 solar panels on each school, ear-  
27 marking the money from solar sold onto the grid @ \$0.49 kwh, for teachers pay only.

28 [SF Tesla Society, February 9, 2014 - Paul Kangas, N.D ...](#)



[www.sftesla.org/Newsletters/2014/SFTS\\_news\\_2014\\_02\\_09.htm](http://www.sftesla.org/Newsletters/2014/SFTS_news_2014_02_09.htm)

**Paul Kangas** served in the U.S. Navy from 1960-1964. **Paul** was a guard to congressmen and the President. He received his B.A. in Journalism & Biology from **San Francisco** State University in 1969. **Paul** went on to receive a J.D. degree from Hastings Law School in 1973. He currently

[S.F. school board candidates face tough pandemic choices ...](#)

☞ <https://www.sfchronicle.com/bayarea/article/S-F-school-board-candidates-face-tough-pandemic-15579213.php>

**Paul Kangas**, criminal defense investigator. This candidate did not respond to the questions. Jill Tucker is a **San Francisco** Chronicle staff writer. Email: jtucker@sfchronicle.com Twitter: ...

[San Francisco Forensic Investigator Paul Kangas Keeps The ...](#)

[case-xyz2020a.com/index.php?post/San-Francisco-Forensic-Investigator-Paul-Kangas-Keeps-The-Ruling-Elite-On-Their-Toes](#)

**San Francisco** Forensic Investigator **Paul Kangas** Keeps The Ruling Elite On Their Toes Don't do crime with public money in front of **Paul Kangas**. This modern Sam Spade will latch onto the case like a pit-bull and never let go.

Billionaire Real Estate Mogul David Rockefeller dies at age 101. His San Francisco “Bag Man” James Bronkema is also dead. John Molinari, their Italian “business man” mob-fixer is in his final years.

**The end of an era of real estate corruption, bribery, elitist black-listing and crony politics on the West Coast.**

Deepti Hajela, Associated Press

The billionaire philanthropist who was the last of his generation in the famously philanthropic Rockefeller family died, Monday, March 20, 2017, according to a family spokesman. (AP Photo/D. Pickoff, File) NEW YORK (AP) — David Rockefeller, the billionaire businessman and philanthropist who was the last in his generation of one of the country’s most famously philanthropic families, died Monday. He was 101. Rockefeller died in his sleep at his home in Pocantico Hills, New York, according to his spokesman, Fraser P. Seitel. He was the grandson of

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1 Standard Oil co-founder John D. Rockefeller and the youngest of six children born to John D.  
2 Rockefeller Jr. With the passing of his siblings, he became the guardian of his family's fortune and  
3 head of a sprawling network of family interests, both business and philanthropic, that ranged from  
4 environmental conservation to the arts. To mark his 100th birthday in 2015, Rockefeller gave 1,000  
5 acres of land next to a national park to the state of Maine. Aspects of the Rockefeller brothers'  
6 upbringing became famous, including the 25-cent allowance, portions of which had to be set aside  
7 for charity and savings, and the inculcation that wealth brings great responsibility. Two of his  
8 brothers held elected office: Nelson Rockefeller served as the governor of New York, hungered for  
9 the White House and briefly served as vice president. Winthrop Rockefeller was a governor of  
10 Arkansas. David Rockefeller, however, wielded power and influence without ever seeking public  
11 office.

12       Among his many accomplishments were spurring the project that led to the World Trade  
13 Center. And unlike his other brothers, John D. III and Laurance, who shied from the spotlight and  
14 were known for philanthropy, David Rockefeller embraced business and traveled and spoke widely  
15 as a champion of enlightened capitalism. "American capitalism has brought more benefits to more  
16 people than any other system in any part of the world at any time in history," he said. "The problem  
17 is to see that the system is run as efficiently and as honestly as it can be." Rockefeller graduated  
18 from Harvard in 1936 and received a doctorate in economics from the University of Chicago in  
19 1940. He served in the Army during World War II, then began climbing the ranks of management  
20 at Chase Bank. That bank merged with The Manhattan Company in 1955 He was named Chase  
21 Manhattan's president in 1961 and chairman and chief executive officer eight years later. He retired  
22 in 1981 at age 65 after a 35-year career. In his role of business statesman, Rockefeller preached  
23 capitalism at home and favored assisting economies abroad on grounds that bringing prosperity to  
24 the Third World would create customers for American products. He parted company with some of  
25 his fellow capitalists on income taxes, calling it unseemly to earn \$1 million and then find ways to  
26 avoid paying taxes on it. He didn't say how much he paid in taxes and never spoke publicly about  
27 his personal worth. In 2015, Forbes magazine estimated his fortune at \$3 billion. As one of the  
28 Rockefeller grandchildren, David belonged to the last generation in which the inherited family

1 billions were concentrated in a few hands. The next generation, known as “the cousins,” has more  
2 people. Rockefeller was estimated to have met more than 200 rulers in more than 100 countries  
3 during his lifetime, and often was treated as if he were a visiting head of state. Under Rockefeller,  
4 Chase — now JPMorgan Chase & Co. — was the first U.S. bank to open offices in the Soviet  
5 Union and China and, in 1974, the first to open an office in Egypt after the Suez crisis of 1956.

6 In his early travels to South Africa, Rockefeller arranged clandestine meetings with several  
7 underground black leaders. “I find it terribly important to get overall impressions beyond those I get  
8 from businessmen,” he said. But Rockefeller took a lot of heat for his bank’s substantial dealings  
9 with South Africa’s white separatist regime and for helping the deposed, terminally ill Shah of Iran  
10 come to New York for medical treatment in 1979, the move that triggered the 13-month U.S.  
11 embassy hostage crisis in Tehran. Rockefeller maintained the family’s patronage of the arts,  
12 including its long-standing relationship with New York’s Museum of Modern Art, of which his  
13 mother had been a fervent patron. His private art collection was once valued at \$500 million. The  
14 Rockefeller estate overlooking the Hudson River north of New York City is the repository of four  
15 generations of family history, including Nelson’s art and sculpture collection. One of the major  
16 efforts of Rockefeller’s later years was directed at restoring family influence in the  
17 landmark Rockefeller Center, most of which had been sold in the 1980s to Japanese investors. He  
18 eventually organized an investor group to buy back 45 percent of the property. His philanthropy and  
19 other activities earned him a Presidential Medal of Freedom, the nation’s highest civilian honor, in  
20 1998. Rockefeller and his wife, the former Margaret McGrath, married in 1940 and had six children  
21 — David Jr., Richard, Abby, Neva, Margaret and Eileen. His wife, an active conservationist, died in  
22 1996. James Bronkema was his Bag Man that paid various public officials along with the Coblentz  
23 Law firm. For the dirtiest deals, though, John L. Molinari would step in. Molinari uses his sub-gang  
24 comprised of: The Amelia Commercial Owners' Association, John L. Molinari Assc, The Molinari  
25 Family Partnership LLC, Twenty Five Fifty Five Larkin, The Rapallo Group, Inc., Golden Van  
26 Associates LLC  
27 John Molinari Partners and other fronts.

28 Molinari is part of the North Beach Italian business men organization. The FBI has been

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1 thought to have bugged his Van Ness, Larken Street, Columbus Avenue locations as well as his  
2 cars.

3 In 1987 Mr. Molinari was a 52-year-old insurance and gun-for-hire man who had served on  
4 the Board of Supervisors since 1972, including five terms as president. He played a key role in  
5 engineering Mrs. Feinstein's elevation to Mayor in 1978, and in 1982 became a Democrat, essential  
6 to advancing in a city that is 77 percent Democratic. He has earned a reputation as a politician who  
7 knows his way around City Hall and can bring warring factions to battle. Molinari is said to have  
8 lied about which district he actually lived in, on records filed for that election. Roger Boas,  
9 Molinari's friend, was arrested for running a pedophile underage sex ring for the rest of the San  
10 Francisco City Hall Elites. Molinari's daughter was removed from his home, per the now public  
11 police report records, to protect her from sexual abuse. She was placed in protective custody in a  
12 center on California Street, in San Francisco, where she provided investigators with damaging  
13 information about her father.

14 Molinari's large crooked nose and squinty deep-set eyes did not help him avoid the "North  
15 Beach Mob" assertions cast by his political adversaries. Warren Hinckle once called him "*A sad*  
16 *version of The Godfather...*"

17  
18 **Anatomy of A Civic Corruption Case- San Francisco- The Bridge To Sin**

19 THE COLD CASE THAT IS NOW VERY HOT! INVESTIGATORS NOW HAVE THE  
20 FINAL PIECES OF THE PUZZLE!Link to story: <http://wp.me/p4e1uX-2LV>  
21 See how the Golden Gate Bridge and a little bridge between two buildings at Embarcadero Center  
22 connected to an organized crime and child sex abuse ring for billionaires in A billion dollar real  
23 estate political kickback scam, by San Francisco “elites”, to create an owned and controlled Senator.  
24  
25 Interesting that one has posted pictures of them-self dancing and hugging very young girls on  
26 Facebook, one was arrested and indicted for running an underage prostitution ring for billionaire  
27 campaign backers and San Francisco “elites”, One (A senior public official) had their daughter  
28 removed from their home by the police because she was sexually abused (Police reports available)

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1 and one was charged with hiring underage prostitutes.

2  
3 You would think it would be hard to be indicted for BOTH running a child prostitution ring for  
4 Pacific Heights billionaires AND helping to embezzle government funds for Moscone Convention  
5 Center AND Embarcadero Center but one managed to do it all, on behalf of the others.

6  
7 James Bronkema was known as David Rockefeller's "Bag Man" on the West Coast. He looked  
8 exactly like the greedy little "Monopoly Man" Billionaire on the game-board and even sported the  
9 same mustache and vest just to make the point that he was not only corrupt, he was BAD ASS  
10 CORRUPT and he would get the Rockefellers on your ass if you messed with him!

11  
12 When a real estate or political policy action needed to be greased, Bronkema or Coblenz showed up  
13 with the cash for the Supervisors, inspectors and public policy-types. Bronkema was one of the  
14 creators of "Flower" and ran the cash into John Molinari's Mayoral campaign. He put his girl-  
15 friends in executive city jobs as payoff for services rendered. Their hope was to move Molinari  
16 from Mayor, to Senator to Governor and on up... but that didn't work out..... when the FBI  
17 showed up on some doorsteps.

18  
19 Bronkema ran the Business Bureau, The Golden Gate Bridge, Embarcadero Center and Rockre, a  
20 "private business operations group" for the Rockefellers. He funneled kickbacks, crony deals and  
21 special favors from San Rafael to Oakland to City Hall.

22  
23 They got a different party to play Senator and Molinari was forgotten but not forgiven for his false  
24 campaign district address, tax form creativity and family police incidents. A bug was placed in  
25 Molinari's Classic Jaguar and feds got quite a bit of dirt on old-school San Francisco corruption off  
26 of Molinari's North Beach idle chatter. Molinari then turned State's evidence.

27  
28 Once Molinari ate it in the elections, they plowed all of the cash into Feinstein.

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1  
2 A key associate (Goudie, aligned with Molinari) was a top Presidential appointee and campaign  
3 funder who was arrested and indicted for federal funds fraud in the Christopher Columbus Scandal  
4 which emulated the Golden Gate Bridge Scandal with the same consultants. (Check out his old  
5 Facebook page)

6  
7 The new Silicon Valley Prostitution cases have opened up the Old San Francisco child prostitution  
8 cases, as girls reveal decades of abuse and finally tell reporters what really happened back then.  
9 Which Silicon Valley and SF Venture Capitalists, who you see quoted in the news lately, were  
10 founders of “Flower” the top secret San Francisco underage sex ring for billionaires , held in  
11 the billionaires hotels so surveillance security could be totally controlled, (With SF, NYC and  
12 Silicon Valley Branches), which is, apparently, still operating? Why are they so excited about all of  
13 the underage girls coming over the border in the Mexican child border crisis? Why are Silicon  
14 Valley CEO’s and VC’s so supportive of “child Immigrants”?

15  
16 Paying a bribe for real estate exclusives was often done with cash and hookers, known as “pink  
17 cash” in SF.

18  
19 Why was NAMBLA allowed to thrive in San Francisco at the time, Including being given San  
20 Francisco Public Libraries, On Potrero hill and in other locations, to hold their secret “how to abuse  
21 children” meetings? (See FBI reports on NAMBLA)

22  
23 Which San Francisco billionaire VC, in the news lately for other reasons, has a regular weekly  
24 appointment to have six nude girls come over and read him books from his library while he  
25 pleasures himself?

26  
27 Which one is under investigation regarding a murder and an attempted murder?  
28

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1 Which one ordered a “hit” on someone?

2  
3 Part of Kubrick’s film: “Eyes Wide Shut” was based on “Flower”. The cost for a young virgin  
4 started at \$50,000.00. Taking her virginity was called: “picking a flower”.

5  
6 Run all of the names on your database and draw the financial, business and personal connections  
7 and see how interesting this case REALLY is!

8  
9 Who was the bigger real estate guru: Blum, Rockefeller or Shorenstein?

10  
11 What do Dianne Feinstein, Richard Blum, James Bronkema, Roger Boas, John Molinari and David  
12 Rockefeller all have in common? All them reported to WHO?

13  
14 Nobody can now say they “didn’t know what was going on!” The evidence overtly implicates all of  
15 the players.

16  
17 Was there a different reason, than we were told, that Mayor George Moscone was killed? Dan  
18 White said he was “drugged up on Twinkies”, was he drugged up on something else so he could  
19 carry out his “kill orders” from on high?

20  
21 Who went to federal prison and who didn’t?

22  
23 Who ordered the case shut down, but who kept working on it because they thought there was a  
24 major cover-up going on?

25  
26 Who took the fall while the others kept on keeping on?

27  
28 Who paid for who’s political campaign..and still does? Who pulls who’s strings?

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Who is under 24 hour digital device surveillance by 5 different agencies? (Answer: EVERY SINGLE ONE OF THEM, THEIR FAMILIES AND ASSOCIATES)

What is a RICO?

What did federal investigators find when they set-up an office in one of the suspects condo buildings across from his office above Chevy's Restaurant?

How bad is running a child prostitution ring for the San Francisco elite and Silicon Valley founders?

How much, in bribes and corruption, did the exclusive little bridge from one Embarcadero Center to another, over the public road, really cost Boas, Rockefeller, Molinari, Bronkema and Feinstein?

Who is still operating as a front for whom?

Let's discuss. Send in your links. Watch for the YOUTUBE VIDEO: Anatomy of A Civic Corruption Case and please ask PBS Frontline to pick up the full length version!

Please ask City, State and Federal agencies to OFFICIALLY RE-OPEN THIS CASE!

TA- Former FB\*, Associate Producer/ D- SF Chron, FG, J- Worked with Bruce Brugman, GG, HJK, R- Latimes, Wspo-G, bSpecial thanks to D at Regional Federal Office

SAN FRANCISCO'S COLDEST CASE / A coverup is still suspected ... 16 Feb 2003 ... chief administrative officer under mayors George Moscone and Dianne Feinstein. ... Campaign posters of Boas dotted the city, and a prostitute ... on the brothel operators, Roger Boas and seven other



1 customers, including ...

2  
3 [http://www.sfgate.com/magazine/article/SAN-FRANCISCO-S-COLDEST-CASE-A-coverup-is-](http://www.sfgate.com/magazine/article/SAN-FRANCISCO-S-COLDEST-CASE-A-coverup-is-still-2669756.php)  
4 [still-2669756.php](http://www.sfgate.com/magazine/article/SAN-FRANCISCO-S-COLDEST-CASE-A-coverup-is-still-2669756.php) – [View by Ixquick Proxy](#) – [Highlight](#)

5  
6 The Secret Life of a ‘Shadow Billionaire’ ▶ &lt;p&gt;JavaScript required to play &lt;a  
7 hreflang="en" type="video/mp4" href="https://videos.files.wordpress.com/fsB9480q/the-secret-life-  
8 of-a-shadow-billionaire\_std.mp4"&gt;The Secret Life of a &#8216;Shadow  
9 Billionaire&#8217;&lt;/a&gt;. &lt;p&gt;This bridge broke the camels back and connects,  
10 politically and financially, to The Golden Gate Bridge District which was, at the time, operated as a  
11 private government for personal profit by the suspects. These is the only real estate project in the  
12 City that got this deal...bribes DO work!.... until you get caught!

13  
14 To protect the identity of the abused girl, we will not show the un-blurred form but it, and  
15 associated files, can be seen at SFPD, FBI and WIKILEAKS via a FOIA

16  
17  
18 1. [Dianne Feinstein – Wikipedia, the free encyclopedia](#) Dianne Goldman

19 Berman Feinstein, born Dianne Emiel Goldman .... Richard Ramírez, and in so doing  
20 angered detectives by giving away details of his crimes.

21  
22 [https://en.wikipedia.org/wiki/Dianne\\_Feinstein](https://en.wikipedia.org/wiki/Dianne_Feinstein) – [View by Ixquick Proxy](#) – [Highlight](#)

23  
24 2. [Dianne Feinstein’s “espionage” – Salon.com](#) 24 Jul 2012 ... In sum, leaks of  
25 classified information are a heinous crime when done to ... But what makes the case  
26 of Dianne Feinstein extra egregious is that, ...

27  
28 [http://www.salon.com/2012/07/24/dianne\\_feinsteins\\_espionage/](http://www.salon.com/2012/07/24/dianne_feinsteins_espionage/) – [View by Ixquick](#)

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[Proxy](#) – [Highlight](#)

GOLDEN GATE BRIDGE ▶ &lt;p>JavaScript required to play &lt;a hreflang="en" type="video/mp4" href="https://videos.files.wordpress.com/2m8DfJgZ/golden-gate-bridge\_dvd.mp4">GOLDEN GATE BRIDGE&lt;/a>.&lt;p>

3. [Dianne Feinstein on Crime – On The Issues](#) Voted YES on reinstating \$1.15 billion funding for the COPS Program. Amendment would increase funding for the COPS Program to \$1.15 billion for FY 2008 to ...

[http://www.ontheissues.org/domestic/Dianne\\_Feinstein\\_Crime.htm](http://www.ontheissues.org/domestic/Dianne_Feinstein_Crime.htm) – [View by Ixquick](#)

[Proxy](#) – [Highlight](#)

4. [Dianne Feinstein – News, Articles, Biography, Photos – WSJ.com](#) As California's senior Senator, Dianne Feinstein has built a reputation as an independent voice, working with both Democrats and Republicans to find ...

[topics.wsj.com/person/F/dianne-feinstein/5519](https://topics.wsj.com/person/F/dianne-feinstein/5519) – [View by Ixquick](#) [Proxy](#) – [Highlight](#)

5. [Dianne Feinstein Biography – Encyclopedia of World Biography](#) Dianne Feinstein was elected San Francisco's first female mayor in 1979 and ... was employed by a public affairs group that was interested in criminal justice.

<http://www.notablebiographies.com/Du-Fi/Feinstein-Dianne.html> – [View by Ixquick](#)

[Proxy](#) – [Highlight](#)

6. [Committee Assignments – Senator Dianne Feinstein](#) The following are Senator Feinstein's current committee assignments: ... in the Senate, ranging from criminal justice to antitrust and intellectual property law.

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www.feinstein.senate.gov/public/index.cfm/committee-assignments – [View by Ixquick Proxy](#) – [Highlight](#)

7. the Wicked Witch of the West Dianne Feinstein – Government ... The petition to Charge the Wicked Witch Dianne Feinstein with treason is gaining ground. I would not hold your breath on this as the criminal that occupies the ...

[http://www.governmentpropaganda.net/wicked\\_witch-of-the-west-feinstein.html](http://www.governmentpropaganda.net/wicked_witch-of-the-west-feinstein.html) – [View by Ixquick Proxy](#) – [Highlight](#)

Snopes Misses on Story of Collusion Between Sen. Feinstein and ... 31 May 2013 ... Feinstein and Husband’s Company. Written by Bob Adelman ... Why, the husband of Senator Dianne Feinstein, that’s who! What a bunch of ...

<http://www.thenewamerican.com/usnews/crime/item/15579-snopes-misses-larger-story-on-sales-of-post-offices-by-california-sen-feinstein-s-husband-s-company> – [View by Ixquick Proxy](#) – [Highlight](#)

Worst case scenario: Egomaniac billionaires, who loved sex with children, controlled the real estate deals in San Francisco, because they needed to feel powerful. They had George Moscone killed because he wasn’t cool with their sex ring/real estate shenanigans and to put their own person in the top post in Government, aimed for the Presidency. The investigation needs to be re-opened and all cover-up actions overturned.

DG

1. Dianne Feinstein launches scathing attack on CIA over alleged ... 11 Mar

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2014 ... Senator Dianne Feinstein speaks to reporters after accusing the CIA of cover-up and criminal activity in a speech on the Senate floor.

CIA says: "Feinstein, you fucked with the wrong people, we have ALL of the dirt on you, did you forget who we are!"

<http://www.theguardian.com/world/2014/mar/11/feinstein-accuses-cia-intimidation-torture-report> – [View by Ixquick Proxy](#) – [Highlight](#)

[Meet CISA – Dianne Feinstein’s Latest Attack on Privacy, Civil ...](#) 8 hours ago ... Unsurprisingly, the only “distinctly native American criminal class,” as ... Cisa is what Senator Dianne Feinstein, the bill’s chief backer and the ...

<http://www.infowars.com/meet-cisa-dianne-feinsteins-latest-attack-on-privacy-civil-liberties-and-the-internet/> – [View by Ixquick Proxy](#) – [Highlight](#)

2. [Dianne Feinstein Articles, Photos, and Videos – Los Angeles Times](#) The Justice Department has announced that it won’t pursue a criminal ... Dianne Feinstein: Here’s how to deal with the desperate children at the border. Dianne ...

<http://www.latimes.com/topic/politics/government/dianne-feinstein-PEPLT002021-topic.html> – [View by Ixquick Proxy](#) – [Highlight](#)

3. [Feuding CIA, Senate avoid criminal charges from Justice ... – KPCC](#) 5 days ago ... Senate Intelligence Committee Chairwoman Dianne Feinstein alleged in ... On Thursday, the Justice Department declined to bring criminal ...

<http://www.scpr.org/news/2014/07/10/45264/feuding-cia-senate-avoid-criminal->

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charges-from-jus/ – [View by Ixquick Proxy](#) – [Highlight](#)

4. [Dianne Feinstein Calls Out the C.I.A. for Spying on the Senate : The ...](#) 11 Mar 2014 ... The C.I.A. spied on the Senate, Dianne Feinstein said on Tuesday. ... the Panetta review to the Department of Justice as a possible criminal act.

<http://www.newyorker.com/online/blogs/cloread/2014/03/dianne-feinstein-calls-out-the-cia-for-spying-on-the-senate.html> – [View by Ixquick Proxy](#) – [Highlight](#)

5. [Dianne Feinstein – Huffington Post](#) Former Montana Gov. Brian Schweitzer (D) has spurred plenty of Internet buzz as of late over some comments he made about Sen. Dianne Feinstein (D-California).

<http://www.huffingtonpost.com/news/dianne-feinstein/> – [View by Ixquick Proxy](#) – [Highlight](#)

The San Francisco Bay Guardian newspaper came under direct, and personal, attack for attempting to expose these indiscretions. Senior Bay Guardian and EX SF Weekly and FIST staff know the whole story.

[g-No Criminal Charges In Senate-CIA Spat, Justice Department Says ...](#) 6 days ago ... Senate Intelligence Committee Chairwoman Dianne Feinstein alleged in ... On Thursday, the Justice Department declined to bring criminal ...

<http://www.npr.org/blogs/thetwo-way/2014/07/10/330465260/no-criminal-charges-in-senate-cia-spat-justice-department-says> – [View by Ixquick Proxy](#) – [Highlight](#)

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1                   1. Moscone–Milk assassinations – Wikipedia, the free  
2                   encyclopedia The Moscone–Milk assassinations were the killings of San  
3                   Francisco Mayor George ... as it meant Moscone could tip the balance  
4                   of power on the Board as well as ... White fled the scene as Feinstein entered  
5                   the office where Milk lay dead.

6  
7                   [https://en.wikipedia.org/wiki/Moscone%E2%80%93Milk\\_assassinations](https://en.wikipedia.org/wiki/Moscone%E2%80%93Milk_assassinations) – Vi  
8                   ew by Ixquick Proxy – Highlight

9  
10                  2. Dianne Feinstein – Wikipedia, the free encyclopedia Dianne Goldman  
11                  Berman Feinstein, born Dianne Emiel Goldman (/ˈfaɪnstam/ .... “As president  
12                  of the board of supervisors, it’s my duty to make this announcement. Both  
13                  Mayor Moscone and Supervisor Harvey Milk have been shot and killed.

14  
15                  [https://en.wikipedia.org/wiki/Dianne\\_Feinstein](https://en.wikipedia.org/wiki/Dianne_Feinstein) – View by Ixquick  
16                  Proxy – Highlight

17  
18                  3. Testimony of Diane Feinstein in the trial of Dan White for the killing  
19                  ... Q Now, Mayor Feinstein, George Moscone, who was the actually elected  
20                  Mayor of ... had the power, did he not, to appoint persons to the Board of  
21                  Supervisors, ... a problem from taking place, because Dan Horanzey  
22                  was to be sworn at 11:30, ...

23  
24                  [law2.umkc.edu/faculty/projects/ftrials/milk/feinsteintestimony.html](http://law2.umkc.edu/faculty/projects/ftrials/milk/feinsteintestimony.html) – View  
25                  by Ixquick Proxy – Highlight

26  
27                  4. Dianne Feinstein Gun Laws Wouldn’t Have Stopped Harvey Milk  
28                  ... 19 Mar 2013 ... Dianne Feinstein gun laws would not have stopped the

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murders of Harvey Milk, ... body, and I was the one to put a finger in a bullet hole, trying to get a pulse. ... The same month that Harvey Milk and George Moscone were murdered, ... I believe that she realized that it is the ...

<http://www.politicaloutcast.com/2013/03/dianne-feinstein-gun-laws-stoppedmurders-harvey-milk-george-moscone-jonestown/> – [View by Ixquick Proxy](#) – [Highlight](#)

5. [Dianne Feinstein On Moscone, Milk Deaths – YouTube](#) 19 Jul 2010 ... Dianne Feinstein reflects on the tragic deaths of George Moscone and Harvey Milk. ... election fraud and the people who got him in went on a child killing spree ? ... where she understands the power a gun can give to a person, both as .... change the fact that regulating guns will ...

<https://www.youtube.com/watch?v=4051pdMlnQ> – [View by Ixquick Proxy](#) – [Highlight](#)

6. [Just learned Diane Feinstein replaced a Mayor back in 70's who was ...](#) After he was killed Dianne Feinstein was sworn in as mayor as she was then ... and thus could tip the Board's balance of power in Moscone's favor. ... City Hall to meet with Moscone and make a final plea for appointment.

<http://www.godlikeproductions.com/forum1/message2099147/pg1> – [View by Ixquick Proxy](#) – [Highlight](#)

7. [CITY HALL SLAYINGS / 25 Years Later / Revisiting the horror of that ...](#) 26 Nov 2003 ... Dianne Feinstein was president of the Board of Supervisors. ... "I put my finger to see if there was any pulse, and it went in a

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1 bullet hole in his ... Ten days before Moscone and Milk were killed, a mad  
2 San ... The mayor had the power to name a supervisor to replace White, and  
3 ...

4  
5 [http://www.sfgate.com/news/article/CITY-HALL-SLAYINGS-25-Years-](http://www.sfgate.com/news/article/CITY-HALL-SLAYINGS-25-Years-Later-Revisiting-2510798.php)  
6 [Later-Revisiting-2510798.php](http://www.sfgate.com/news/article/CITY-HALL-SLAYINGS-25-Years-Later-Revisiting-2510798.php) – [View by Ixquick Proxy](#) – [Highlight](#)

7  
8 8. [Tales from Colma – The Martydom of Mayor Moscone – Part 3/4](#) He  
9 slipped the gun into his shoulder holster and put on his suit jacket to hide it.  
10 ... White, who'd learned how to kill during basic training,  
11 straddled Moscone, leaned ... Dianne Feinstein found Milk only moments  
12 after White left. ... stories about the electric chair charred the public into  
13 second ...

14  
15 <http://www.notfrisco.com/colmatales/moscone/mosc3.html> – [View by](#)  
16 [Ixquick Proxy](#) – [Highlight](#)

17  
18 9. [George Moscone's murder explored in new play directed by his son](#)  
19 [...](#) 9 Jan 2012 ... It's a hard-hitting memory play that harnesses the power of  
20 myth, history ... the rise of (Dianne) Feinstein have clouded the event  
21 of Moscone's death. ... that had fallen away from a bullet wound and  
22 tried to put it back in place.

23  
24 [http://www.mercurynews.com/ci\\_19707104](http://www.mercurynews.com/ci_19707104) – [View by Ixquick](#)  
25 [Proxy](#) – [Highlight](#)

26  
27 10. [Five Ways Dianne Feinstein Has Kicked Butt | TIME](#) 12 Mar 2014 ...  
28 Dianne Feinstein, chairman of the Senate Intelligence Committee, speaks with



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1 ... after a speech on the Senate floor that accused the CIA of searching  
2 computers set up ... But this isn't the first time Feinstein has spoken  
3 truth to power. ... White murdered Milk and Moscone because he ...

4  
5 <http://www.time.com/22000/five-ways-dianne-feinstein-has-kicked-butt/> –  
6 [View by Ixquick Proxy](#) – [Highlight](#)

7  
8 6. [All the President's Women \(Part 3\): Diane Feinstein | Dave Hodges ...](#) 4 Jan  
9 2013 ... In 2009, Senator Dianne Feinstein introduced legislation which ... liberal  
10 democrat please explain to America how Feinstein's crimes are not as ...

11  
12 [http://www.thecommonsenseshow.com/2013/01/04/all-the-presidents-women-](http://www.thecommonsenseshow.com/2013/01/04/all-the-presidents-women-part-3-diane-feinstein/)  
13 [part-3-diane-feinstein/](#) – [View by Ixquick Proxy](#) – [Highlight](#)

14  
15 7. [48 Hours Mystery: Who killed Natalie Antonetti? – CBS News](#) Call to police  
16 from an angry wife blows a decades-old Texas cold case wide open. ... horrible  
17 scene,” Johnny Goudie told CBS News correspondent Tracy Smith.

18  
19 <http://www.cbsnews.com/news/48-hours-mystery-who-killed-natalie-antonetti/> – [Vie](#)  
20 [w by Ixquick Proxy](#) – [Highlight](#)

21  
22 8. [Columbus Day – Offnews.info | Inteligencia y Seguridad, Terrorismo ...](#) 12  
23 Oct 2009 ... The grandiloquently named Christopher Columbus Quincentenary ...  
24 Miami developer and Republican fund raiser John Goudie, resigned last ...

25  
26 <http://www.offnews.info/verArticulo.php?contenidoID=18022> – [View by Ixquick](#)  
27 [Proxy](#) – [Highlight](#)  
28

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9. '92 Columbus Jubilee Is Mired in Problems – New York Times 18 Dec 1990

... The chairman, John N. Goudie, a Republican fund-raiser in Miami, said ... by the Christopher Columbus Quincentenary Jubilee Commission ...

<http://www.nytimes.com/1990/12/18/us/92-columbus-jubilee-is-mired-in-problems.html> – View by Ixquick Proxy – Highlight

Download PDF Stephen J. Summerhill and John Alexander Williams, Sinking Columbus: Contested History ... Appalachian State University, headed the Christopher Columbus ... sponsors. Goudie could not even attract support from Hispanic American.

[http://www.learner.org/courses/worldhistory/support/reading\\_2\\_3.pdf](http://www.learner.org/courses/worldhistory/support/reading_2_3.pdf) – View by Ixquick Proxy – Highlight

10. Articles citations with the tag: COLUMBUS, Christopher, 1451-1506 Results

1 – 50 ... Describes the presumed landing place of Christopher Columbus in the New ... Columbus Quincentenary Jubilee Commission, John Goudie.

[connection.ebscohost.com/tag/COLUMBUS%252C%2BChristopher%252C%2B1451-1506](http://connection.ebscohost.com/tag/COLUMBUS%252C%2BChristopher%252C%2B1451-1506) – View by Ixquick Proxy – Highlight

11. Goodbye, Columbus by Garry Wills | The New York Review of Books 22

Nov 1990 ... The Conquest of Paradise: Christopher Columbus and the Columbian ... When I interviewed John Goudie in his Florida real estate office, ...

<http://www.nybooks.com/articles/archives/1990/nov/22/goodbye-columbus/> – View by Ixquick Proxy – Highlight

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1  
2 12.U.S. Senator Dianne Feinstein publicly accuses CIA of criminal ... 11 Mar  
3 2014 ... WASHINGTON — The head of the U.S. Senate Intelligence Committee  
4 accused the CIA Tuesday of criminal activity in improperly searching a ...

5  
6 news.nationalpost.com/ 2014/ 03/ 11/ u-s-senator-dianne-feinstein-publicly-accuses-  
7 cia-of-criminal-activit y-airing-intense-dispute-with-spy-agency/ – View by Ixquick  
8 Proxy – Highlight

9  
10 13.Meet CISA – Dianne Feinstein’s Latest Attack on ... – Prison Planet.com 8  
11 hours ago ... Unsurprisingly, the only “distinctly native American criminal class,” as  
12 ... Cisa is what Senator Dianne Feinstein, the bill’s chief backer and the ...

13  
14 http://www.prisonplanet.com/ meet-cisa-dianne-feinsteins-latest-attack-on-privacy-  
15 civil-liberties- and-the-internet.html – View by Ixquick Proxy – Highlight

16  
17 Articles about Roger Boas – Los Angeles Times Former San Francisco Chief  
18 Administrative Officer Roger Boas was sentenced Friday to three years’ ... Ex-S.F.  
19 Official Boas Pleads Guilty on Sex Counts.

20  
21 articles.latimes.com/keyword/roger-boas – View by Ixquick Proxy – Highlight

22  
23 14.Former City Official Charged in S.F. Teen-Age Sex Inquiry – Los ... 5 Oct  
24 1988 ... At the same time, newly unsealed indictments show that 12 others, ... In  
25 addition to retired Chief Administrative Officer Roger Boas, 67, charges ...

26  
27 articles.latimes.com/1988-10-05/news/mn-2880\_1\_city-official – View by Ixquick  
28 Proxy – Highlight

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15.SAN FRANCISCO'S COLDEST CASE / A coverup is still suspected ... 16

Feb 2003 ... The 1980s offered no shortage of criminal activity for Garnier's vice .... grand jury returned indictments on the brothel operators, Roger Boas and ...

<http://www.sfgate.com/magazine/article/SAN-FRANCISCO-S-COLDEST-CASE-A-coverup-is-still-2669756.php> – [View by Ixquick Proxy](#) – [Highlight](#)

16.Aangirfan: ROBERT GRAY AND THE CIA'S SHADOW

GOVERNMENT 6 May 2014 ... f) Roger BOAS (ASCO company) – SHAVIT was the right hand of Roger ..... fled to Switzerland in 1983 to avoid a 65-count criminal indictment.”

[aanirfan.blogspot.com/2014/05/bob-gray-shadow-government.html](http://aanirfan.blogspot.com/2014/05/bob-gray-shadow-government.html) – [View by Ixquick Proxy](#) – [Highlight](#)

17.Golden Gate Bridge Corruption – BAY AREA CORRUPTION Strauss

was indicted July 28 on six counts of fraud, perjury and cover-up charges .... Articles about Roger Boas – Los Angeles Times Ex-S.F. Official Boas ...

[bayareacorruption.weebly.com/golden-gate-bridge-corruption.html](http://bayareacorruption.weebly.com/golden-gate-bridge-corruption.html) – [View by Ixquick Proxy](#) – [Highlight](#)

18.Full text of “California Democrats’ golden era, 1958-1966” Roger Kent,

Building the Democratic Party in California, 1954-1966, 1981. ...

and Dianne Feinstein, San Francisco Roger Boas, San Francisco Chuck Bosley, ...

<http://www.archive.org/stream/calidemsgolden00coperich/>

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calidemsgolden00coperich\_djvu.txt – [View by Ixquick Proxy](#) – [Highlight](#)

19.[SAN FRANCISCO’S COLDEST CASE / A coverup is still suspected ...](#) 16

Feb 2003 ... chief administrative officer under mayors George Moscone and Dianne Feinstein. ... Campaign posters of Boas dotted the city, and a prostitute ... on the brothel operators, Roger Boas and seven other customers, including ... Was George Moscone killed because he was going to bust “Flower”? Was Harvey Milk’s death just a distraction cover?

<http://www.sfgate.com/magazine/article/SAN-FRANCISCO-S-COLDEST-CASE-A-coverup-is-still-2669756.php> – [View by Ixquick Proxy](#) – [Highlight](#)

20.[SAN FRANCISCO UPSET BY TOURISM DECLINE – NYTimes.com](#) 10

May 1981 ... “We’ve got to fill up the hotel rooms,” observed Roger Boas, San ... set by the Board of Supervisors and approved by Mayor Dianne Feinstein. Was Moscone killed because he was going to blow the case on “Flower” wide open? Was this a Manchurian Candidate ploy to put Feinstein in office?

<http://www.nytimes.com/1981/05/10/us/san-francisco-upset-by-tourism-decline.html> – [View by Ixquick Proxy](#) – [Highlight](#)

21.[Articles about John Molinari – Los Angeles Times](#) John Molinari, 94; Former

Justice of State Appellate Court. September 16, 2004 | From ... Agnos in the Nov. 3 primary to succeed Mayor Dianne Feinstein. NEWS ...

[articles.latimes.com/keyword/john-molinari](http://articles.latimes.com/keyword/john-molinari) – [View by Ixquick Proxy](#) – [Highlight](#)

22.[Divided San Francisco Eyes Election – New York Times](#) 21 Oct 1987 ...

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1 ... Dianne Feinstein, is nearing the end of her eventful term as Mayor. ... one  
2 between Supervisor John L. Molinari, a former Republican who is a ...

3  
4 [http://www.nytimes.com/ 1987/ 10/ 21/ us/ divided-san-francisco-eyes-](http://www.nytimes.com/1987/10/21/us/divided-san-francisco-eyes-election.html)  
5 [election.html](http://www.nytimes.com/1987/10/21/us/divided-san-francisco-eyes-election.html) – [View by Ixquick Proxy](#) – [Highlight](#)

6  
7 23.[Board of Supervisors : Inauguration](#) 31 Jan 2014 ... Dianne Feinstein,  
8 January 08, 1970. John Molinari, January 08, 1972. Ron Pelosi (Seated) – President  
9 of the Board, January 08, 1968. Dorothy ...

10  
11 <http://www.sfbos.org/index.aspx?page=3030> – [View by Ixquick Proxy](#) – [Highlight](#)

12  
13 24.[Just learned Diane Feinstein replaced a Mayor back in 70's who was](#)  
14 [...](#) Diane Feinstein was his political enemy on a coalition that opposed him, ...  
15 “Milk, Silver, and Lau along with John Molinari and Robert Gonzales ...

16  
17 <http://www.godlikeproductions.com/forum1/message2099147/pg1> – [View by](#)  
18 [Ixquick Proxy](#) – [Highlight](#)

19  
20 25.[Usual Suspects – San Francisco’s Political Homepage » Board History](#) Harry  
21 Britt was first appointed in January 1979 by Mayor Dianne Feinstein, succeeding  
22 ... John Molinari was elected in 1971, 1975, 1977, 1979, 1980, and 1984.

23  
24 <http://www.sfusualsuspects.com/elections/board-history/> – [View by Ixquick](#)  
25 [Proxy](#) – [Highlight](#)

26  
27 26.[Jewish Community-3 – Encyclopedia of San Francisco](#) Roberta  
28 Achtenberg, Roger Boas, Harold Dobbs (father of the author of this

Pg 805 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

essay), Dianne Feinstein, Leslie Katz, Barbara Kaufman, Quentin Kopp, Mark Leno, ...

<http://www.sfhistoryencyclopedia.com/articles/j/jews3.htm> – [View by Ixquick Proxy](#) – [Highlight](#)

27.[Former City Official Charged in S.F. Teen-Age Sex Inquiry](#) – Los ... 5 Oct 1988 ... In addition to retired Chief Administrative Officer Roger Boas, 67, ... George R. Moscone and Dianne Feinstein, to serve for a decade as the ...

[articles.latimes.com/1988-10-05/news/mn-2880\\_1\\_city-official](http://articles.latimes.com/1988-10-05/news/mn-2880_1_city-official) – [View by Ixquick Proxy](#) – [Highlight](#)

28.[Board of Supervisors : Inauguration](#) 31 Jan 2014 ... Dianne Feinstein – President of the Board, January 08, 1970. John Barbagelata, January 08, 1970. Roger Boas, January 08, 1962. Robert E.

<http://www.sfbos.org/index.aspx?page=3030> – [View by Ixquick Proxy](#) – [Highlight](#)  
[RelatedHometown Public Journalism Wiki's: SF Bay Area - Senator Yee arrested for organized crime](#)In "bay area corruption"

[All Tesla Model S Cars recalled by NHTSA due to proven fire danger. Now requires "ballistic fire shield". See: http://wp.me/P4e1uX-22P](#)In "60 minutes investigation"

[Enough is enough, Silicon Valley must end its elitism and arrogance: Washington Post](#)In "60 minutes investigation"

The dark politics, corruption and scandal of the administration and governance of the

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1 Golden Gate Bridge. What can be done? Let's explore that question on behalf of all citizens...

- 2 • Who killed Tommy Walker, a devout Mormon who was to organize a major part of
- 3 the celebration and who then discovered the corruption in the Bridge District Committee.
- 4 • Who is Patricia Novick and what is the exact accounting of her pre-contract meetings
- 5 as the contractor AND the girlfriend of the Bridge Director?
- 6 • TOXIC LEAD is being used on the bridge and it is poisoning tourists, neighbors and
- 7 bridge workers. Touch the bridge or breath while you are on it and you could die or be
- 8 sickened for life: see: <http://www.goldengatewaste.org>
- 9 • Bridge Directors for over a decade have gotten kickbacks from paint suppliers for
- 10 paint used on the bridge. James and John, the former directors, know what we mean
- 11 • The Bridge Directors and all of the Presidio Events marketing staff were informed of
- 12 all of the facts on this site BEFORE they started marketing to sponsors for money yet they
- 13 hid these facts from sponsors in their marketing. That is fraud.
- 14 • Why were no key celebration contracts put through the bid process and only
- 15 rewarded to friends of the Directors?
- 16 • Which same persons were involved in both the 50th & 75th events and have the
- 17 same kickback and favors deals?
- 18 • Why was the former Bridge Director told to permanently remove himself from
- 19 politics forever? Hear reporters reviews of his recovered police reporter for child abuse.
- 20 • Which Bridge Director was under police investigation because of a police complaint
- 21 filed by his own daughter?
- 22 • Which Bridge Director bribed almost every member of the Board of Supervisors on
- 23 behalf of his real estate monopoly?
- 24 • How could a Bridge District that can't even afford to run it's ferry's (according to
- 25 NBC News) afford to engage in ANY party extravaganzas?
- 26 • Bridge says that their plans for an insurance disaster are to " Keep their fingers
- 27 crossed"!!!!
- 28 • Which Bridge Director used taxpayer money to buy a car?



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- The Bridge never pays its bills and has had millions in debts.
- Why did CALTRANS say that it did not want the Golden Gate Bridge District involved with it?
- Why wasn't the law followed, which required that the Bridge District be dissolved?
- Gene Pratt and Marin Advocates Association said the Bridge District was operating as an illegal private government. Are they? To whose benefit?
- The attached chart of currently contracted celebration suppliers and their business associates shows a highly suspicious set of connections. What do you think?
- The mansion on the point near China Beach, behind Robin William's old house, in the SeaCliff District of San Francisco has its entire foundation built out of stolen Golden Gate Bridge Steel. It is even painted with bridge orange paint. Which Bridge District Director slipped the owner that stash?



- How many senior Bridge District staff got permit and tax favors in the SeaCliff

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District of San Francisco? Why?

- In the Book "Paying the toll: local power, regional politics, and the Golden Gate Bridge" By Louise Nelson Dyble, we see that the Golden Gate Bridge District was built on corruption and maintains its process as a citadel of corruption with "charges of extravagance, no-bid contracts and inside deals" that began in 1938 and have increased yearly up to 2012. This book can be ordered from Amazon.com

Paying the Toll | Dyble, Louise Nelson - University of Pennsylvania Local Power, Regional Politics, and the Golden Gate Bridge ... Tunnel Authority for its arrogance, corruption, and self-perpetuating administration of the bridge.

[www.upenn.edu/pennpress/book/14601.html](http://www.upenn.edu/pennpress/book/14601.html) -

Paying the Toll: Local Power, Regional Politics, and the Golden ... Dyble indicts the Golden Gate Bridge and Tunnel Authority for its arrogance, corruption, and self-perpetuating administration of the bridge."—Journal of ...

[www.amazon.com/Paying-Toll-Regional-Politics-American/dp/0812241479](http://www.amazon.com/Paying-Toll-Regional-Politics-American/dp/0812241479)

more corruption and lack of transparency and accountability on san ... Dec 5, 2013 ... These same crooks and very corrupt people think they can hoodwink ..... The family of Tilotilo Faoa addressed the Golden Gate Bridge District ...

[kilamanjaro-kilamanjaro.blogspot.com/ 2013/ 12/ more-corruption-and-lack-of.html](http://kilamanjaro-kilamanjaro.blogspot.com/2013/12/more-corruption-and-lack-of.html) -

Electoral Systems, District Magnitude and Corruption - ResearchGate Golden under funding

1 from the National Science Foundation (SES-0074860) ... larger electoral districts are associated  
 2 with higher levels of corruption in open- list ..... found that policy outputs that are geographically  
 3 targetable — rivers, bridges,.  
 4 [www.researchgate.net/ publication/  
 5 228672865\\_Electoral\\_systems\\_district\\_magnitude\\_and\\_corruption/ file/ 50463516ebff54a0f3.pdf](http://www.researchgate.net/publication/228672865_Electoral_systems_district_magnitude_and_corruption/file/50463516ebff54a0f3.pdf) -  
 6 [Golden Gate Bridge Toll-Takers Get Layoff Notices In Advance Of All ... Mar 8, 2013 ...](#)  
 7 The end of cash tolls on the Golden Gate Bridge hit hard for toll-takers ... tolling will be in  
 8 place, Golden Gate Bridge district officials announced. ... every so often, but yet can't address their  
 9 in-house corruption and ineptitude.  
 10 [www.huffingtonpost.com/ 2013/ 03/ 08/ golden-gate-bridge-toll-takers\\_n\\_2836762.html](http://www.huffingtonpost.com/2013/03/08/golden-gate-bridge-toll-takers_n_2836762.html)  
 11 [Whistleblower's Handbook - kkc.com](#)A Must For Your Christmas Wish List --  
 12 Corruption Currents, WSJ  
 13 [www.kkc.com/Whistleblower'sHandbook](http://www.kkc.com/Whistleblower'sHandbook)  
 14 [Ewa Bauer: A Journey From Oppression to The Golden Gate Bridge ... May 1,](#)  
 15 2013 ... Golden Gate Span Undergoes Complex Seismic Revamp (2005) ... then joining  
 16 the Golden Gate Bridge, Highway and Transportation District, ...  
 17 [enr.construction.com/ business\\_management/ workforce/ 2013/ 0506-a-journey-from-oppression-  
 18 to-the-golden-gate.asp](http://enr.construction.com/business_management/workforce/2013/0506-a-journey-from-oppression-to-the-golden-gate.asp) -  
 19 [Obama's Shaggy Dog Story About the Golden Gate Bridge - Hit ... Jul 17, 2012 ... However,](#)  
 20 the Golden Gate Bridge was funded by a \$35 million dollar bond issue by the six counties in  
 21 the Golden Gate Bridge District. It was a ...  
 22 [www.reason.com/ blog/ 2012/ 07/ 17/ obamas-shaggy-dog-story-about-the-golden  
 23 San Francisco Bay Area news roundup | abc7news.com](http://www.reason.com/blog/2012/07/17/obamas-shaggy-dog-story-about-the-golden) 10 hours ago ... A roundup of Bay Area  
 24 stories making news today. ... wetlands and an extended bridge overlooking the wetlands, according  
 25 to the Golden Gate ...  
 26 [abclocal.go.com/kgo/story?id=5876580](http://abclocal.go.com/kgo/story?id=5876580) -  
 27  
 28 [Paying the Toll A Political History of the Golden Gate Bridge and ... V Bay Area Rapid Transit](#)

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1 versus the Golden Gate Bridge . ..... mismanagement, and corruption as other government  
2 agencies.<sup>21</sup> She suggests a number of.

3 [www.uctc.net/research/diss111.pdf](http://www.uctc.net/research/diss111.pdf) -

4  
5 [Public Employee “Pay Transparency” Efforts Fall Short | Union Watch Jun 4, 2013 ... Bay Area](#)

6 News Group, Bay Area city/county employees and Southern ... Marin Independent

7 Journal , Golden Gate Bridge District employees

8 [www.unionwatch.org/ public-employee-pay-transparency-efforts-fall-short/](http://www.unionwatch.org/public-employee-pay-transparency-efforts-fall-short/) -

9 [Man \[child molester\] Dives From \[Golden Gate\] Bridge To Elude ... Jul 11, 2012 ... 7/6/12:](#)

10 Transportation bill makes Golden Gate Bridge suicide barrier eligible for ... such as

11 the Golden Gate Bridge District — a special purpose district ..... hid pedophile priests doesn't mean

12 the entire church is corrupt today.

13 [www.freerepublic.com/focus/news/2904547/posts](http://www.freerepublic.com/focus/news/2904547/posts) -

14  
15 [Occupy, Unions Shut Down Golden Gate Ferry - WNYC May 1, 2012 ...](#)

16 The Golden Gate Bridge Highway and Transportation District is in ... the corruption which Big

17 Business has infected our Government with.

18 [www.wnyc.org/story/284216-occupy-shuts-down-golden-gate-ferry/](http://www.wnyc.org/story/284216-occupy-shuts-down-golden-gate-ferry/) -

19  
20 [IN THE CITY BY THE BAY » Humphrey Fellows at Cronkite ... Oct 26, 2013 ... The](#)

21 Bay Bridge looks mesmerising with sun's golden rays shining on its ... According to him,

22 Tenderloin District got its name from corrupt cops who ... Golden Gate and Japanese parks are

23 stunningly green but do also go to ...

24 [cronkitehhh.personal.asu.edu/2013/10/city-bay/](http://cronkitehhh.personal.asu.edu/2013/10/city-bay/) -

25 [CorpWatch : US: Concrete contractor cuts deal with prosecutors Jun 1, 2008... retrofit](#)

26 project at the Golden Gate Bridge, a wastewater treatment plant in Burlingame, ... for orchestrating

27 a fraud scheme that resulted in tons of substandard ... With great fanfare in May 2006, San

28 Francisco District Attorney ...

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1 [www.corpwatch.org/article.php?id=15068](http://www.corpwatch.org/article.php?id=15068) -

2  
3 [Ross Valley Sanitary District declines to take action against legal ... Jun 24, 2013 ... The Ross](#)  
4 [Valley Sanitary District will not seek a legal claim against a contract ... Part of the Bay Area News](#)  
5 [Group. Site ... Golden Gate Bridge.](#)

6 [www.marinij.com/rosskentfieldgreenbrae/ci\\_23530765/ross-valley-sanitary-district-declines-take-](http://www.marinij.com/rosskentfieldgreenbrae/ci_23530765/ross-valley-sanitary-district-declines-take-action-against)  
7 [action-against](#) -

8 [INSURANCE BROKERAGE ANTITRUST LITIGATION - Third](#)  
9 [Circuit Golden Gate Bridge, Highway and Transportation District,. Glenn Singer ..... Racketeer](#)  
10 [Influenced and Corrupt Organizations \(RICO\) Act. Concluding they had ...](#)

11 [www2.ca3.uscourts.gov/opinarch/074046p.pdf](http://www2.ca3.uscourts.gov/opinarch/074046p.pdf) -

12  
13 [Report on the Causes of Municipal Corruption in San Francisco - 1909 Ruef's Failure to Control](#)  
14 [The District Attorney's Office .... of the discovery of gold and its population by gold seekers and](#)  
15 [adventurers from all parts of the world.](#)

16 [www.sfmuseum.org/hist5/graft1.html](http://www.sfmuseum.org/hist5/graft1.html) -

17  
18 [Golden Gate Bridge Reveals Influence of "Shadow Government ... Mar 23, 2009 ...](#)  
19 ["The Golden Gate Bridge and Highway District, in its efforts to stave off outside authority, helped](#)  
20 [maintain and ... "No one likes corruption.](#)

21 [www.newswise.com/articles/golden-gate-bridge-reveals-influence-of-shadow-government-](http://www.newswise.com/articles/golden-gate-bridge-reveals-influence-of-shadow-government-agencies)  
22 [agencies](#) -

23  
24 [Articles about Joseph Strauss - Los Angeles Times](#) The defendant, Joseph Strauss, was  
25 given until Oct. 25 by U.S. District Judge ... Strauss was indicted July 28 on six counts of fraud,  
26 perjury and cover-up charges . ... representing such clients as Golden Gate Bridge builder Joseph  
27 Strauss.

28 [articles.latimes.com/keyword/joseph-strauss](http://articles.latimes.com/keyword/joseph-strauss) -

[Toledo Iron Workers leader in race to unseat union's president ... Jul 19, 2001... including San Francisco's Golden Gate bridge, the United Nations ... of an investigation into police corruption in the District of Columbia, site ...](#)  
[www.toledoblade.com/ Retail/ 2001/ 07/ 19/ Toledo-Iron-Workers-leader-in-race-to-unseat-union-s-president.html -](#)

[OccupySF - SFist: San Francisco News, Food, Arts & Events Occupy Celebrates First Anniversary With Financial District Protests \[Schedule\] .... Well, part of it could be that the Golden Gate Bridge District just agreed to pay a .... Help end "corporate personhood, attack corruption, and support community ...](#)  
[www.sfist.com/tags/occupysf -](#)

### **THE GOLDEN GATE BRIDGE GALLERY OF CORRUPTION:**

How "Special Projects" work, step by step instructions:

- #1. Make-up a "special project" (ie: New paint, big party, "art" project, Staff "reduction technology", etc.)
- #2. Hire your friends to put it on.
- #3. Pay your friends three times more than it actually costs.
- #4. Wait for the project to end or fail; it doesn't matter, either way, because your friends already have the cash. Who cares if it blows up.
- #5. Have dinner with your friends you gave the contracts to. Watch as they slide a manila envelope with the "extra cash" to you under the table or wire it to your law firm to put into your campaign fund.
- #6. Buy girlies, gin, condo's and campaigns.
- #7. Make up another "special project"... YAHOO!

[My Interview with Tiffany Renée | Success & Chocolate ... Governments;](#)

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1 the Golden Gate Bridge, Highway and Transportation District; ... but continue to use a corrupt  
2 campaign financing system to become elected.

3 [www.successandchocolate.com/ post/ 18456012387/ my-interview-with-tiffany-renee](http://www.successandchocolate.com/post/18456012387/my-interview-with-tiffany-renee) -

4  
5 [Silver and Gold, the Gilded Age - Explore San Francisco](#) San Francisco became a city during the  
6 Gold Rush of 1849, prior to that it was a sleepy ... It was an area so rife with vice that the naive ...  
7 Because the political landscape was considered so corrupt, an emperor was proclaimed in 1859, ...  
8 construction of the Oakland Bay Bridge and the Transbay Tu

9 [www.exploresf.biz/silverngold.html](http://www.exploresf.biz/silverngold.html) -

10  
11 [New SMART chief responds to critics | Watch Sonoma County](#) Aug 30, 2011 ... The district already  
12 has retrenched, downsizing the initial 70-mile rail line .... here in Sonoma County well away from  
13 his brand of corruption and sleaze only to find .... Golden Gate Bridge and Highway  
14 Transportation District.

15 [www.watchsonomacounty.com/ 2011/ 08/ transportation/ new-smart-chief-responds-to-critics/](http://www.watchsonomacounty.com/2011/08/transportation/new-smart-chief-responds-to-critics/) -

16  
17 [UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY IN ... Sherman Act, the](#)  
18 Racketeer Influenced and Corrupt Organizations Act ("RICO"), and ..... Industries Inc., Sunburst  
19 Hospitality Corp., Golden Gate Bridge Highway.

20 [www.insurancebrokeragesettlement2013.com/ Portals/ 0/ Documents/ 2435%20Stipulation%20of](http://www.insurancebrokeragesettlement2013.com/Portals/0/Documents/2435%20Stipulation%20of%20Settlement.pdf)  
21 [%20Settlement.pdf](#) -

22  
23 [Liability Update: The Top 10 Cases You Need to Know - California ...](#) Aug 21,  
24 2013 ... Golden Gate Bridge, Highway and Transportation District (2012) ... corruption or systemic  
25 abuse (generally outside the scope), and whether the ...

26 [www.cajpa.org/ sites/ default/ files/ conference/ presentations/ fc13/](http://www.cajpa.org/sites/default/files/conference/presentations/fc13/CAJPA2013handout.082113.pdf)  
27 [CAJPA2013handout.082113.pdf](#) -

28 [Upholding the Public Trust - Vol. 71 · No. 4 - Public Roads](#) Golden Gate Bridge District



Pg 814 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 Engineer Denis Mulligan (left) shows USDOT ... A kickback is money paid for referral of business  
2 for a contract — without the ...

3 [www.fhwa.dot.gov/publications/publicroads/08jan/01.cfm](http://www.fhwa.dot.gov/publications/publicroads/08jan/01.cfm) -

4  
5 Vendor/Supplier Code of Conduct - University of San Francisco (USF) Golden Gate Bridge at noon  
6 .... Bribery, Kickbacks and Fraud - No funds or assets of the vendor/supplier shall be paid, loaned or  
7 otherwise disbursed as bribes, ...

8 [www.usfca.edu/purchasing/Vendor/Supplier\\_Code\\_of\\_Conduct/](http://www.usfca.edu/purchasing/Vendor/Supplier_Code_of_Conduct/) -

9  
10 Cheat Sheet - The Daily Beast Oct 17, 2013 ... Plan for hellish traffic on  
11 the Golden Gate Bridge this weekend. ... over the so- called Cornhusker Kickback in the Obamacare  
12 negotiations, ...

13 [www.thedailybeast.com/cheat-sheets/2013/10/17/cheat-sheet.html](http://www.thedailybeast.com/cheat-sheets/2013/10/17/cheat-sheet.html) -

14  
15 Terry Lawler - Verizon.net John Roebling (1806 – 1869), chief engineer of the Brooklyn Bridge,  
16 was born in ... a member of the Bridge board was getting a 10 % kickback of Haigh's payment in ...  
17 Both the George Washington Bridge (1931) and the Golden Gate Bridge ...

18 [mysite.verizon.net/vze111aso/John%20Roebling2.html](http://mysite.verizon.net/vze111aso/John%20Roebling2.html) -

19  
20 Bridge-Collapse Toll Hits 11 - WSJ.com Nov 28, 2011 ... Built 10 years ago to echo San  
21 Francisco's Golden Gate Bridge, the ... Kickbacks, bribery and collusion are widely believed to take  
22 a big toll on ...

23 [online.wsj.com/news/articles/SB10001424052970203935604577065840444195570](http://online.wsj.com/news/articles/SB10001424052970203935604577065840444195570) -

24  
25 Change of Subject: Let's vote! Name the scandal Dec 11, 2008 ... It has a nice familiar ring to it --  
26 The Golden Gate Bridge being the world-famous span that connects the city of San Francisco to  
27 Marin County ...

28 [blogs.chicagotribune.com/news\\_columnists\\_ezorn/2008/12/lets-vote-name-the-scandal.html](http://blogs.chicagotribune.com/news_columnists_ezorn/2008/12/lets-vote-name-the-scandal.html) -



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1  
2 Bio for Mark J. Linderman - Rogers Joseph O'Donnell Internal investigation and disclosures  
3 pursuant to the Anti-Kickback Act and ... the Central Artery in Boston, the San Francisco Airport,  
4 the Golden Gate Bridge, ...  
5 [www.rjo.com/linderman.html](http://www.rjo.com/linderman.html) -

6  
7 Articles about Roger Boas - Los Angeles Times Ex-S.F. Official Boas Sentenced in Teen  
8 Prostitution Case ... Not long ago, John Molinari seemed sure to realize a lifelong ambition to be  
9 elected mayor of San ...  
10 [articles.latimes.com/keyword/roger-boas](http://articles.latimes.com/keyword/roger-boas) -

11  
12 Transcript Q 622 Part 1: Telephone conversation between Jim Jones and John Maher of ... Now I  
13 would've ov— I would've been guilty of an oversight here, and we— that would ..... The only other  
14 Republican of note is [San Francisco Supervisor John] Molinari , ...  
15 [jonestown.sdsu.edu/ AboutJonestown/ Tapes/ Tapes/ TapeTranscripts/ Q622.html](http://jonestown.sdsu.edu/AboutJonestown/Tapes/Tapes/TapeTranscripts/Q622.html) -

16  
17 San Francisco Genealogy - Obituaries and Death Notices, Mm - M Source: San Francisco Examiner  
18 8 Nov 1935 Contact: John Ireland ..... of Bianchina and the late Giacomo MOLINARI, and loving  
19 brother of John MOLINARI, Mrs. .... "MONROE--TRIAL of ELIZA MUNRO -- The case of Eliza  
20 MUNRO indicted for ...  
21 [www.sfgenealogy.com/sf/vitals/sfobimm.htm](http://www.sfgenealogy.com/sf/vitals/sfobimm.htm) -

22  
23 Articles about Roger Boas - Los Angeles Times Former San Francisco Chief Administrative Officer  
24 Roger Boas was ... pleaded guilty Thursday to charges stemming from having sex with teen-age  
25 girls at a brothel ... Not long ago, John Molinari seemed sure to realize a lifelong ambition to be ...  
26 [articles.latimes.com/keyword/roger-boas](http://articles.latimes.com/keyword/roger-boas) -

27  
28 Golden Gate Bridge marks 75 yrs since opening against steep odds ... May 27, 2012 ...

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1 The Golden Gate Bridge Highway and Transportation District is now ... Well, the  
2 corrupt directors of the Golden Gate Bridge District have seen ...  
3 [www.reuters.com/ article/ 2012/ 05/ 27/ goldengatebridge-idUSL1E8GNFPA20120527](http://www.reuters.com/article/2012/05/27/goldengatebridge-idUSL1E8GNFPA20120527) -  
4  
5 [more corruption and lack of transparency and accountability on san ... Dec 5, 2013 ... What stops us](#)  
6 [from blocking the gate - and stopping all work? ..... THE GOLDEN GATE BRIDGE DISTRICT -](#)  
7 [BOARD OF DIRECTORS.](#)  
8 [kilamanjaro-kilamanjaro.blogspot.com/ 2013/ 12/ more-corruption-and-lack-of.html](http://kilamanjaro-kilamanjaro.blogspot.com/2013/12/more-corruption-and-lack-of.html) -  
9  
10 [\\$8 Golden Gate Bridge Toll Could Be New Reality for North Bay ... Nov 12, 2013 ...](#)  
11 The Golden Gate Bridge, Highway and Transportation District board of .... turn the tables on these  
12 politicians who very much like their corrupt ...  
13 [novato.patch.com/ groups/ around-town/ p/ 8-toll-golden-gate-bridge-proposed](http://novato.patch.com/groups/around-town/p/8-toll-golden-gate-bridge-proposed) -  
14  
15 [Paying the Toll: Local Power, Regional Politics, and the Golden ...](#) Since its opening in 1937,  
16 the Golden Gate Bridge has become an icon for the beauty ... From the moment of  
17 the bridge district's incorporation in 1928, its managers .... the Golden Gate Bridge and Tunnel  
18 Authority for its arrogance, corruption, ...  
19 [www.amazon.com/Paying-Toll-Regional-Politics-American/dp/0812241479](http://www.amazon.com/Paying-Toll-Regional-Politics-American/dp/0812241479) -  
20

21 San Francisco Nurses Demand to Have Pervert Mark Zuckerberg's Name Taken Off  
22 Hospital  
23  
24  
25  
26  
27  
28

Pg 817 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

-  
Corrupt  
Zuckerberg  
found to be  
using the  
sick as a  
tax evasion  
ploy  
- Patients,  
public and  
staff object



to a hospital being named after the world's largest human rights abuser  
- Mayor Ed Lee died at Zuckerberg Hospital due to politics  
- Facebook found to be spying on patients and selling their private medical data to governments and  
political groups BY PAULA

**BOLYARD**-----

By Courtney Tubbs |

San Francisco: Democrat LGBT Lutheran Pastor And Friends Arrested In Child Porn Raid  
Five pedophiles at a Pro-LGBT Church have been arrested by San Francisco's Child  
exploitation Task Forces for the production of child pornography. Controversial Gay Pastor of  
Christ Church Lutheran in San Francisco, the Rev. Steven Sabin, heads the congregations.

Reverend Steven Sabin is the head pastor at the Christ Church Lutheran national website,  
where he hosts streaming podcasts worldwide.

1 The  
2 Christ Lutheran  
3 Church says  
4 that they're  
5 aware of the  
6 Pastor's arrest.  
7 A HUGE  
8 number of  
9 church bosses



10 have been charged with sex abuse, touching kids and running sex cults in San Francisco.

11 -----  
12  
13 Rats, Public Defecation, Open Drug Use...

14 San Francisco Is An Uninhabitable Hellhole...

15 **San Francisco Tech Executives And City Hall Directors Play A Dangerous Game With**  
16 **Trophy Wives and Prostitutes**

17 By Lucy Carl

18 Driven by a psychopathic need to employ sex for power instead of passion, executives from  
19 Salesforce, Twitter, Google, Facebook and other famous brands, live a life of debauchery few  
20 normal people can comprehend.

21  
22 Almost every \$200K/year executive has both a "trophy" wife and a bevy of prostitutes on call. Most  
23 of them get the wives and the hookers from many of the same resources. Most of the prostitutes  
24 know about the trophy wives, and vice versa, because it is part of "The Deal".

25  
26 The San Francisco Zoo fundraising parties, The "House Parties" (on Broadway, west of Divisadero  
27 in the tony Pacific Heights neighborhood), San Francisco Symphony parties and Opening Nights,  
28 The Red and White Ball Events, The Guardsman parties, The Spinster Events, The Rosewood Hotel

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1 “tech events” and a horde of other elitist find-some-ass events deliver the chicks to the Chads.

2  
3 A Trophy Wife is a surgically enhanced woman who dresses like a Playboy model, wears porno  
4 makeup and has a Jessica Rabbit type of cartoonish facial structure. She is acquired by the tech  
5 executive to show off to other tech executives. An unusually large number of San Francisco tech  
6 executives are homosexual but they still have Trophy wives to keep up appearances.

7  
8 At one of these events a young, attractive woman will approach a recently divorced tech executive  
9 and advise him that she understands “the Deal”. She uses code words and alluded to references but  
10 the intent is clear. She is willing to be either a trophy wife or a prostitute because the guy has the  
11 cash and she wants the rich lifestyle. A trophy wife is aware that she must accept the fact that the  
12 man is rich and can get any woman and there is a 3000 to 1 ratio of hot girls to rich men. If she  
13 wants the cash she must accept the non-monogamous sex-with-other-women culture of the tech  
14 males.

15  
16 The Trophy Wives get to live in the big houses with the tech guys and the prostitutes live in  
17 apartments in Marin County and Palo Alto. Many of the prostitutes are from overseas and are  
18 known as “Instagram Girls” because they advertise on Instagram and Match.com as “models”.  
19 Hundreds of these internet hookers are flown into San Francisco, Oakland and San Jose  
20 international airports, daily, on the credit cards of these tech executives. The pot is well stocked.  
21 San Francisco tech executives account for as much bay area sex trafficking, in dollar volume, as the  
22 San Francisco Chinatown gangs. A San Francisco tech prostitute goes for \$1000.00 to \$10000.00  
23 per night while a Chinatown sex worker is only \$300.00 per session.

24  
25 There are over 200 “Personal Services” providers for tech executives who pitch “managing  
26 engagement schedules” for CEO’s. They are pimps who have networked lists of hookers. They are  
27 usually women in the PR business who once were trophy wives, or prostitutes, themselves when  
28 they were younger. Most tech executives will eventually receive an offer from a “Social Events

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1 Manager”, looking to hook them up.

2  
3 Trophy Wives and prostitute offerings can be found jogging on San Francisco’s Marina Green,  
4 sitting overtly in outdoor cafe’s on Chestnut Street and Union Street in the Marina district and at  
5 every “tech event”. They dress in fluorescent Spandex with bare midriff tops and painted on  
6 Spandex leggings shoved as far up their butt-crack as biology will allow. The regulars, though, are  
7 at the elite events and fund-raisers.

8  
9 The websites BACKPAGE.COM, SEEKING ARRANGEMENTS.COM and MATCH.COM are  
10 the source favored by the tech guys for girls-on-demand hookers. Google is in a huge battle against  
11 the government because Google does not want BACKPAGE.COM shut down. It is the top source  
12 for hookers for the men of Google.

13  
14 The parties at the French, British and Russian embassies are notoriously full of high-class hookers  
15 and wannabe trophy wife candidates. The key to confirming them, in person, or on Match.com, is  
16 the use of code words like “generous gentlemen”, “appreciates a special women”, “knows how to  
17 take care of..” , “diamonds..” and other subliminal references.

18  
19 The game can go south, though. Google’s, Tesla Investments and other top executives have been  
20 killed by their hookers. Over 100 top tech execs are now in the news for their over-the-top sex  
21 scandals. A Trophy Wife or a Hooker can blackmail the tech executives at any moment; non-  
22 disclosure agreements be damned. Hundreds of babies are now being paid for by hundreds of tech  
23 executives along with hush-money to keep the names of those babies fathers quiet.

24  
25 Yes, San Francisco truly is the modern version of Sodom and Gomorrah.

26 -----  
27 **San Francisco accepted Hunters Point shipyard land that may still be radioactive**

28 EPA, state health regulators approved transfer in 2015 despite awareness of fraud allegations

1 By [Chris Roberts@cbloggy](mailto:Chris.Roberts@cbloggy)

2  
3 -----  
4 **SAN FRANCISCO HOUSING MARKET IS GETTING GUTTED AS FACEBOOK**  
5 **CRASHES AND CHINESE RUN AWAY**

6 [San Francisco Housing market showing signs of cracking...](#)

7 [As Chinese Money-Hiders Get Busted In California Record Drop in Foreigners Buying...](#)

8 -----  
9 **SAN FRANCISCO IS NOW THE MOST EXTREME PUBLIC SURVEILLANCE**  
10 **CITY IN AMERICA**

11 HIPPIE DIPPIES IN SAN FRANCISCO ARE THE MOST SPIED ON IN USA! IRONIC!  
12 Can you imagine a city in the United States secretly creating a Chinese-style public surveillance  
13 network that can identify everyone? Can you imagine that same city secretly creating a Chinese-  
14 style public watchlisting network?

15  
16 Well imagine no more because it has already happened.

17  
18 When I wrote about "[covert facial recognition street lights coming to a city near you](#)" last year, I  
19 never would have dreamt that my article would become a reality so quickly.

20 -----  
21 **San Francisco is now POOP CITY as HEROIN Needles, AIDS and corruption define**  
22 **the roots of the City**

23 Tourists and shoppers make their way past a panhandler asleep outside a clothing store in  
24 San Francisco on Aug. 25. The streets of San Francisco have long reflected the eccentric city's  
25 governing priorities and many civic contradictions arising from the intersection of wealth and  
26 poverty. (Mason Trinca/For The Washington Post

27 By **Scott Wilson**



**San Francisco Millennium Tower is leaning, sinking and now cracking thanks to corrupt Ed Lee**

San Francisco's leaning, sinking Millennium Tower has a new problem after a window cracked on the 36th floor. The whole building could collapse just like the Florida condo collapse!

"This is a window system that's designed to sustain hurricane force winds so this is obviously of serious concern," said San Francisco Supervisor Aaron Peskin.

[San Francisco in one photograph: Rich liberals sip \\$30 glasses of wine as they watch the city burn](#)

[–] **EcondoesReal** 2 points (+2|-0) 11 hours ago

I lived there, in North Beach for more than a decade. I recently left, and feel such a sense of relief. I can't turn this into a joke since I know that place, but this caption isn't far off. These people will continue to look at all the shit they vote for, and watch how it went wrong, blame someone else, and double down on their bullshit. Fuck that place. They deserve the shit that's coming to them.

- [permalink](#)

[San Francisco's Free Syringes Are Littering Its Streets - Come For The Heroin, Stay For The Corruption](#)

**SAN FRANCISCO MAYOR LONDON BREED EXEMPLIFIES THE WARPED SEX-BASED CRONYISM OF SAN FRANCISCO CITY HALL**

Mayor London Breed exhibited a serious lapse of judgment — and [possibly violated city ethics laws](#) — in accepting several thousand dollars worth of car-related expenses from former Public Works Director Mohammed Nuru.



-----  
**San Francisco Downtown Buildings Are Collapsing And Falling Apart As SF Earth Mass Found To Be Unstable Just Like The Florida Building Collpase**

- City Officials will lie until the cows come home but the fact is that greedy mayor and supervisors overbuilt City to get bribes and developer fees

- When will the first skyscraper collapse and kill huge numbers of people?

BY JANIE HAR AND PAUL ELIASAssociated Press

-----  
**Saudi ties entangle San Francisco's Laurene Powell Jobs' Emerson Collective**

Jamal Khashoggi's MURDER has become a litmus test for business leaders, but some ties are more nuanced — and perhaps more complicated.

by Dylan Byers

-----  
**San Francisco Spends \$30 Million Cleaning Feces, And Use Drug Needles From It's Hepatitis Infected Streets - Literally A U.S. SHITHOLE !!!** (nbcbayarea.com)

**Bay Area reaches highest exodus levels in 10 years. U-Haul says it is running out of 1 way trucks.** (archive.is)

[San Francisco residents navigate sidewalks filled with increasing piles of shit, mattresses, shelving, and other furniture](#)

-----  
**San Francisco Has The Most High-Tech Schools In The World But SF Students Are The Biggest Failures In The World**

- San Francisco proves, again, that it is all fluff and no substance

- Bottom line: "Don't move to San Francisco if you want your kids to get an education!"

-----  
A survey by Blind found that 59% of employees at Bay Area tech companies said they cannot afford homes.

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- San Francisco is too expensive even for tech workers.

San Francisco's housing market is so out of control, most tech workers say they can't afford homes thanks to Google

The San Francisco Bay Area's housing market is so bleak, even tech workers are struggling to buy a home there.

- Cisco, eBay, and Intuit had the highest percentage of employees who said home ownership is elusive.

San Francisco Employee privacy is at stake as corporate surveillance technology monitors Bay Area workers' every move

[Ellen Sheng@ellensheng](mailto:EllenSheng@ellensheng)

#### Key Points

- Corporate interest in surveillance seems to be on the rise to boost productivity.
- A 2018 survey by Gartner found that 22% of organizations worldwide are using employee-movement data, 17% are monitoring work-computer-usage data, and 16% are using Microsoft Outlook- or calendar-usage data.
- Employees are concerned over this invasion of privacy.

[San Francisco Logs 16,000 Feces Complaints in a Week as San Francisco becomes filled with poop and Google assholes...](#)

**WINNING: Arizona Appellate Court decides Nancy Pelosi's Hockey Stick emails must be released** (wattsupwiththat.com)

San Francisco Shall Forever Be Known as POOP CITY  
because of the corrupt politicians and dirty people that live there

1 **Poop City (San Francisco)-We find you with a straw, you're going to jail...but come here if**  
2 **you want a safe place to shoot up heroin, we'll make sure you don't die!**(nbcbayarea.com)

3  
4  
5 **San Francisco's Human Poop Map Shows City Is in Deep Doo-Doo**

6 San Francisco is swiftly moving from one of America's most beautiful cities to one of  
7 America's most troubled cities. The city struggles with crime and the consequences of illegal  
8 immigration after declaring themselves a "sanctuary city". The transit authorities (BART) recently  
9 announced ...

10  <https://www.redstate.com/kiradavis/2017/10/17/san-franciscos-human...>

11 **San Francisco Requires Poop Maps To Help Pedestrians Avoid ...**

12 For those who have maintained that San Francisco is full of . . . whatever, there is now  
13 living proof. How much poop is there on the streets of the City by the Bay?

14 <https://www.dailywire.com/news/12001/san-francisco-requires-poop-ma...>

15 **San Francisco poop map: real thing or a rumor?**

16 Feb 28, 2018 · Of all the claims made by San Francisco's detractors, possibly the most  
17 puzzling to people who actually live in the Bay Area is the "poop map." "The city now offers  
18 people poop maps so they can avoid surprises," contends one online commenter on a recent story at  
19 this website about people ...

20  <https://www.mercurynews.com/2018/02/28/san-francisco-poop-map-real-th...>

21 **San Francisco Set to Roll Out the 'Poop Patrol' to Clean Up ...**

22 It has a funny name, but it's targeting a serious problem. San Francisco is rolling out  
23 the 'PoopPatrol.'

24  <https://www.nbcbayarea.com/news/local/San-Francisco-Set-to-Roll-Out-...>

25 **Holy Crap: San Francisco To Deploy Poop Patrol To Clean Up ...**

26 Aug 15, 2018 · Holy Crap: San Francisco To Deploy Poop Patrol To Clean Up Feces That  
27 Are Apparently Everywhere - Matt Vespa: Well, we all know San Francisco is having problems.

28  <https://townhall.com/tipsheet/mattvespa/2018/08/15/holy-crap-s...>

1 Why is San Francisco ... covered in human feces? | Nathan ...

2 Aug 18, 2018 · It's an empirical fact: San Francisco is a crappier place to live these days.  
3 Sightings of human feces on the sidewalks are now a regular occurrence; over the past 10 years,  
4 complaints about human waste have increased 400%.

5 <https://www.theguardian.com/commentisfree/2018/aug/18/san-francisco-p...>

6 This Map Shows San Francisco Is Covered in Human Poop

7 Citing human waste reports made in San Francisco, software engineer Jenn Wong mapped  
8 the city's most poop-ridden neighborhoods, and it is a feast for watery eyes.

9 <https://www.thrillist.com/news/nation/human-wasteland-map-plots-all...>

10 SF Mayor: 'There's More Feces ... Than I've Ever Seen' - NBC ...

11 San Francisco Mayor London Breed believes homeless advocacy groups that receive  
12 funding from the city need to better educate the homeless to "clean up after themselves."

13  <https://www.nbcbayarea.com/news/local/SF-Mayor-Theres-more-feces-on-...>

14 SF Mayor Says Her City Is Drowning In Poop: 'There's More ...

15 San Francisco Mayor London Breed said the streets of her city are flooded with the  
16 excrement of the homeless in an interview Friday.

17 [dailycaller.com/2018/07/15/san-francisco-poop-problem/](https://www.dailycaller.com/2018/07/15/san-francisco-poop-problem/)

18 (Human) Wasteland - MochiMachine

19 A map of human waste reports made to 311 in San Francisco! (Human) Wasteland; About;  
20 Year. 2008. ... (Human) Wasteland is a mochimachine ... San Francisco's Poop ...

21 [mochimachine.org/wasteland/](https://mochimachine.org/wasteland/)

22 It's no laughing matter — SF forming Poop Patrol to keep ...

23 It sounds like silly elementary school banter, but it's real. San Francisco is about to launch  
24 the Poop Patrol. In about a month, ...

25  <https://www.sfchronicle.com/bayarea/heatherknight/article/It-s-no-lau...>

26 [San Francisco CA plans poop patrol to clean sidewalks | The ...](#)

27 San Francisco plans a six-person poop patrol to clean up city sidewalks after receiving more  
28 than 14,000 complaints of feces since January. But the move sparked mockery and poop emojis

1 plenty on social media.

2 <https://www.sacbee.com/news/state/california/article216722405.html>



More results

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11 -----

12 [San Fr](#)

13 [an-Poopsco](#)

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Typical San Francisco resident man charged with sexually assaulting 99-year-old woman in SF Chinatown as Frisco crime spree worsens

By [Evan Sernoffsky](#)

•

Photo: SFPD

Security photos show a man suspected of sexually assaulting a woman in San Francisco's Chinatown on New Year's Eve.

A man captured after a New Year's Eve sex assault in San Francisco's Chinatown had attacked a 99-year-old woman in her apartment at the Ping Yuen housing project, officials said Wednesday.

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[San Francisco train conductor reportedly warns riders to watch 'for needles' amid 'needle litter' epidemic in drug infested SF \(LINK\)](#) (foxnews.com)

[Now San Francisco Wants To Ban Lunch \(LINK\)](#) (downtrend.com)

[When people refuse to navigate piles of human shit to get food, San Francisco has the answer -](#)

[BAN company owned cafeterias to "protect" local restaurants. \(LINK\)](#)

(m.washingtontimes.com)

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**San Francisco's Housing and Homeless Crises at "Boiling Point" Because Of Google-Twitter-Facebook Take-over of City Politicians**

Written by [James Murphy](#)

San Francisco is a city of contrasts. It boasts glorious views of the Golden Gate Bridge and the Pacific Ocean, and it also offers the [stench and disgusting sight](#) of piles of human feces on its sidewalks. It is a place filled with great wealth and striking poverty, with tech billionaires and Silicon Valley companies existing alongside an aggressive panhandling homeless population. While a city full of investors waits nervously on a new wave of initial public offerings (IPOs), drug users shoot up in the streets for anyone — be it tourists, businessmen, or schoolchildren — to see.

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**SAN FRANCISCO BAY AREA'S MEASURE 3 SEEKS TO CREATE "RAPE" BRIDGE TOOLS IN ORDER TO PUT CRONY CASH IN THE POCKETS OF JERRY BROWN'S FRIENDS**

- The Entire Measure 3 Plan Is A Scam To Help Google and Crony Insiders!

Posted by: [Zelda Bronstein](#) - On the June 5 ballot, Regional Measure 3 asks voters in nine Bay Area counties to approve a \$3 increase in tolls on all the region's bridges but the Golden Gate "to reduce auto and truck traffic, relieve crowding on BART, unclog freeway bottlenecks and improve bus, ferry, BART and commuter rail service." Its [supporters](#), who include the Bay Area Council, the Silicon Valley Leadership Group, SPUR, Facebook, and YIMBY Action, call it "a bold, coordinated, region-wide traffic relief plan."

RM3 is bold all right: it's an audacious con that dedicates \$4.5 billion to a hodgepodge of disconnected projects that will bring the Bay Area little traffic relief.

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The San Francisco Bay Area Tech Mafia  
What They Have Been Proven To Be:

Misogynists, Frat Boys, Sexual Abusers, Rapists, Sexual Extortionists, Sexual Harassers,  
Intellectual Property Thieves, Copy-cats, Monopolists, Valuation Collusion-ists, Hooker Addicts,  
Trophy Wife Abusers, Tone Deaf Yuppies, Sociopaths, Closet Homosexuals, Elitist Boys Clubbers,  
Narcissists, Burning Man Orgy Pros, Drug Addicts, Alcoholics, Sex Addicts, Mobsters, Tax Cheats,  
Abusers, Real Estate Scammers, Liars, Racists, Anti-Trust Violators, Political Bribery experts,  
Crony Political, Scam Operators, Election Rigging Financiers

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**NEW SAN FRANCISCO MAYOR SAYS SF IS CONSUMED WITH CRAP**

[San Fran Mayor Laments Human Poop On Streets: 'More Than Ever Seen'...](#)

[CA DEMS REBUKE FEINSTEIN...](#)

[Clean up after yourselves: San Francisco mayor plans to ask homeless nicely not to poo in streets \(rt.com\)](#)

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**The San Francisco Archi-Tastrophe Coming Building Collapses**

- Greed and corruption put San Francisco in the current disaster movie scenario
- Over-building on un-stable ground in a small area subject to earthquakes should have been an obvious bad idea to anybody
- San Francisco City Hall chose to cram developer payola in their pockets and lies into the planning process
- Imagine a million tons of steel and concrete collapsing onto hundreds of thousands of commuters!
- One skyscraper will take down the next one in a 'domino effect'
- 18 buildings have started to fail but you have only heard about a handful of them...

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Pg 830 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 The 39 San Francisco high-rises at risk of collapse during ...

2 The analysis and testing of the structure were reviewed by the City and County  
3 of San Francisco Department of Building Inspection and Professor Ted Zsutty PhD, an internationally  
4 recognized ...

5 <https://sf.curbed.com/2018/6/18/17465696/highrises-san-francisc...>

6 UPDATE: Buildings evacuated near construction site emergency ...

7 Notice of a possible collapse of a 2,000 pound slab of concrete from the 30th floor of 33  
8 Tehama Street prompted immediate evacuations of ten buildings in San Francisco's South of Market  
9 ...

10 [sfexaminer.com/evacuations-underway-near-construction-si...](https://sfexaminer.com/evacuations-underway-near-construction-si...)

11 At Risk in a Big Quake: 39 of San Francisco's Top High Rises

12 experts consider these buildings vulnerable to collapse only in extreme shaking caused by  
13 rare and powerful earthquakes, similar to the one that struck San Francisco in 1906.

14 <https://nytimes.com/2018/06/14/us/california-earthquakes-high...>

15 Buildings safe to reenter surrounding San Francisco high-rise ...

16 The building under construction initially prompted concerns that a 2,000 pound concrete  
17 wall could have collapsed. According to San Francisco Fire Department, the construction company  
18 made the ...

19 [foxnews.com/us/2017/02/15/evacuations-ordered-as-conc...](https://foxnews.com/us/2017/02/15/evacuations-ordered-as-conc...)

20 Booming San Francisco takes unprecedented step to target ...

21 San Francisco's effort at publicizing a list of its buildings marks a new front in seismic  
22 safety — making it easier for residents and workers to easily understand the age of the city's ...

23 [latimes.com/local/lanow/la-me-ln-san-francisco-tall-b...](https://latimes.com/local/lanow/la-me-ln-san-francisco-tall-b...)

24 Which SF High-Rises Could Collapse in an Earthquake

25 The Transamerica Pyramid is among 39 San Francisco high-rise buildings that could  
26 collapse in an earthquake the magnitude of the 1906 quake, according to a new report the New York  
27 Times.

28 [sfweekly.com/news/which-sf-high-rises-could-collapse-i...](https://sfweekly.com/news/which-sf-high-rises-could-collapse-i...)



**Thirty nine San Francisco high rises at risk of collapse in ...**

Thirty-nine high rises in San Francisco are at risk of collapse in a major earthquake, according to a new study by the U.S. Geological Service (USGS).. The vulnerable buildings (known as welded steel moment-frame buildings) were constructed by using a flawed technique to weld columns and beams together.

<https://bdcnetwork.com/thirty-nine-san-francisco-high-rises-risk...>

**Who Will Pay for San Francisco's Tilting, Sinking Millennium ...**

The building, which opened in 2008 and was touted as the most luxurious tower in San Francisco, became a beacon of the city's burgeoning wealth, attracting tech millionaires, venture capitalists ...

**B**<https://bloomberg.com/news/articles/2017-02-01/who>

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**The San Francisco ghosts in Kamala Harris past show that she knows how to F\*ck**  
by [Tiana Lowe](#)

Few outside of California know or care who Willie Brown is. But that may be about to change. Brown spent around a quarter of a century as de facto royalty in California, first serving more than three decades as a member of the California Assembly (15 years

**SHOW ME  
THE MONEY**



**SF District Attorney Kamala Harris says she cannot "find" \$3.7M in Federal cash that she received.**

as its speaker), and then eight years as mayor of San Francisco. He also once carried out an open extramarital affair with a young prosecutor named Kamala Harris, currently a U.S. senator and leading contender for the Democratic presidential nomination. Now, we're far beyond the point that a personal past like that disqualifies a candidate. Harris, after all, is vying to challenge a thrice-married man who once graced the cover of Playboy and publicized his infidelity on the cover of the

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1 New York Post. Candidates' personal lives no longer warrant deep investigation, unless they tell us  
2 something about their professional and political lives.

3 Unfortunately for Harris, the Willie Brown story is not strictly personal. It's also  
4 professional.

5  
6 When Harris was barely 30, she began dating Brown, then in his 60s and speaker of the  
7 California Assembly. To be clear, an ambitious woman dating a powerful man is not alone any  
8 cause for concern. Strong women are attracted to success, and a 30-year-old assistant district  
9 attorney is hardly, say, a 21-year-old intern. But the story doesn't end there.

10 For one thing, Brown  
11 was [married](#) at the time. He wound  
12 up dumping Harris and returning to  
13 his wife as he became mayor.  
14 (Again, in the era of President  
15 Trump, few will clutch their pearls  
16 over this.)



17 More questionable than the romance is the relationship's apparent effect on her finances and her  
18 career. Brown, according to contemporary news accounts, gifted his then-girlfriend two government  
19 jobs with ample salaries — while she was just getting her start as an assistant DA.

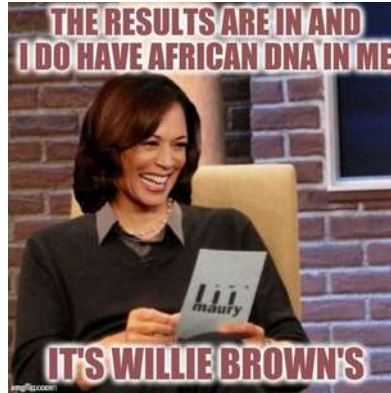
20  
21  
22 As the San Francisco Weekly [reported](#) in 2003:

23 Aside from handing her an expensive BMW, Brown appointed her to two patronage  
24 positions in state government that paid handsomely — more than \$400,000 over five years. In 1994,  
25 she took a six-month leave of absence from her Alameda County job to join the Unemployment  
26 Insurance Appeals Board. Brown then appointed her to the California Medical Assistance  
27 Commission, where she served until 1998, attending two meetings a month for a \$99,000 annual  
28 salary.

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(That's more than \$150,000 in current dollars.)

Even after they broke up, Brown, a San Francisco kingmaker, continued to support Harris' career, boosting her district attorney run and years later [calling](#) on Antonio Villaraigosa to stay out of the Senate race, thus clearing the field for Harris. Just two years into her tenure as senator, Harris now wants to reach the White House.



The facts are messy, but most in California politics are. If she earned few hundred thousand dollars in taxpayer-funded patronage thanks to a personal relationship, that undermines some of her good-government cred. Or at least it requires her to explain how she's changed.

Barack Obama wisely fessed up about his drug usage long before he was a presidential candidate, and he alluded to his



personal growth and past mistakes enough that it created a satisfying narrative, one that couldn't be used against him. Donald Trump was a womanizer and a brash braggart, but that was his entire brand for more than two decades. The first real instance where his past came to haunt him was when

1 he seemed to confess to sexual battery on the now-infamous Access Hollywood tape. The  
2 allegations of consensual affairs never really mattered.

3  
4  
5 Harris doesn't talk about Brown. She says that it's not relevant. But part of her prosecutorial  
6 persona is a posture of toughness on corruption. But the Willie Brown story, with those big  
7 paychecks, gives off at least a whiff of cronyism. She's got to address the charge she was profiting  
8 personally off connections to power — at least if she wants us to believe she actually stands [for the](#)  
9 [people](#).

10 -----  
11 **Was San Francisco Mayor Ed Lee Poisoned, Using Untraceable Spy Technology,**  
12 **Because of His Immigration Scheme?**

- 13 • **Robert Mendick**, chief reporter  
14 • **Hayley Dixon**  
15 • **Victoria Ward**  
16 • **Roland Oliphant**  
17

18 Shell fish toxins, nut tree derivatives, umbrella launched cardiac gases and pocket-based  
19 electric pulse weapons can give any politician a "natural-looking heart-attack" that is man made.  
20 Many believe Andrew Brietbart and Google's Rajeev Motwani were killed this way for political  
21 retribution

22 A Russian agent convicted of spying for Britain was fighting for his life last night amid  
23 suspicions he was poisoned in a shopping centre in Wiltshire.

24  
25 Sergei Skripal, 66, was in intensive care after being exposed to a mysterious substance as he sat on  
26 a bench in the centre of Salisbury. A 33-year-old woman who was with him, is also in critical  
27 condition. Both had collapsed and were unconscious when they were discovered.

28 By Jenna Lyons  
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**San Franciscan's Hate Google: Protesters toss scooters into street to block tech buses in SF**

By **Sarah Ravani**

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**THE DNC'S SAN FRANCISCO SEX CULT OFFERS CLITORAL TOUCHING FOR \$150.00**

We Went UnderCover With An iPhone In San Francisco And Marin County - The Dark Side of the Orgasmic Meditation Company

Almost every member is a registered Democrat and some are highly placed in the DNC. OneTaste is pushing its sexuality wellness education toward the mainstream. Some former members say it pushed them into sexual servitude and five-figure debts.

By Ellen Huet

When Michal got married in August 2015, her family and longtime friends didn't attend. The woman who walked her down the aisle, the dozens of beaming onlookers, her soon-to-be husband—all were people she'd met in the preceding 10 months. Wearing a loose, casual dress borrowed from one of her new friends, Michal spent the ceremony in a daze.

She knew she didn't want to get married like this, in the living room of a rented San Francisco house without her family's support, yet she felt compelled to do it. That uneasy feeling could apply to most of her experiences in OneTaste.

OneTaste is a sexuality-focused wellness education company based in the Bay Area. It's best known for classes on "orgasmic meditation," a trademarked procedure that typically involves a man

1 using a gloved, lubricated fingertip to stroke a woman's clitoris for 15 minutes. For Michal, like  
2 those at her wedding, OneTaste was much more than a series of workshops. It was a company that  
3 had, in less than a year, gained sway over every aspect of her life.

4 -----  
5 **Warren Hinckle describes the corruption he witnessed inside San Francisco City Hall!**

6 **The following is an excerpt from the new book: [Ransoming Pagan Babies: The Selected](#)  
7 [Writings of Warren Hinckle](#) by Heyday Books. We are proud to present the work of Warren  
8 **Hinckle, one of San Francisco's most legendary and larger-than-life personalities. For**  
9 **decades, Warren Hinckle provided unique insight into San Francisco's turbulent political**  
10 **scene and changed the face of American journalism.****

11 On the afternoon of November 6, 1987, the Friday after the election, a crisp and cool San  
12 Francisco day without a sunbeam of hope piercing the dark electoral cloud gathered over his head,  
13 Supervisor John Molinari was secluded in his second floor City Hall office, receiving no visitors but  
14 the intimate and the anointed. Molinari's new campaign manager, Jack Davis, knocked on the door  
15 and went in without waiting, as was his custom. He stopped short at the scene inside. John Molinari  
16 was seated behind his desk in what seemed to be a state of shock. In a supplicant pose before the  
17 supervisor was the Reverend Cecil Williams with his arms outstretched in prayerful entreaty. The  
18 black pastor gave Davis the annoyed glance of one who is interrupted during a sacramental process.  
19 Molinari waved the campaign manager off. Davis closed the door softly. The moment had the  
20 sanctity of the confessional. Indeed, it was a bizarre religious tableau of the type not seen in  
21 American politics since the conniving Kissinger knelt with the besotted Nixon in the bunker hours  
22 of Watergate.

23 The Reverend Williams, playing the rat to Molinari's mole—even his friends call Molinari  
24 the "Mole"—told him that he was jumping ship to join Art Agnos, who had just come within a few  
25 thousand votes of burying the Mole, the former front-runner, in his own campaign mistakes. And  
26 Williams had the chutzpah to urge the Mole to quit the race while Agnos was soaring ahead.  
27 Molinari, who had just slam-dunked \$1.4 million of his friends' money down the political sewer,  
28 was stupefied; the smiling clergyman wanted to turn the election into a coronation. Williams is the



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1 boss of Glide Memorial United Methodist Church, the Notre Dame of the Tenderloin. He is also  
2 one of the face cards of San Francisco politics.

3 A savvy ecclesiastic who receives \$800,000 a year from the city to feed the hungry in his  
4 Tenderloin tabernacle, Williams was a premature supporter of Molinari. That was back in the good  
5 old days when Jack took an early lead in the polls after raising over a million dollars from  
6 garbagemen (the supervisor's grandfather was a pioneer San Francisco scavenger), real estate  
7 developers and others doing business with the city and county of San Francisco. When Molinari  
8 came in a distant second in the November 3 primary, Williams was quick to apprehend an apparent  
9 change in divine will; God, after all, is on the side of the winners. The mercurial minister was the  
10 first of many longtime Molinari supporters to jump ship, citing what he saw as the candidate's move  
11 to the right; many of the others deserting were men of capital who simply could not afford to back a  
12 loser.

13 The shock effect of Agnos's dramatic showing against the previously heavily favored  
14 Molinari affected many in the city, not the least Agnos himself. "Feinstein is going to go to pieces,"  
15 he said. "She won't be able to handle re-entering ordinary life without the policemen and the limos  
16 on hand. You can't imagine the incredible power it gives you being mayor but you've got to be able  
17 to handle the power. I'm tough. I'll be able to handle it. I'll stand on the steps of City Hall like  
18 Feinstein never did and let the ordinary people come up to me and ask me questions, call me an  
19 ass----. The power won't get to me." Agnos told me that the night Williams did his routine in  
20 Molinari's office. Agnos seemed adrenalated and his eyes were glistening with the otherworldly  
21 look of a messiah. He was in the state of political rapture that once moved his fellow Democrat  
22 Lyndon Johnson, high from peacemaking, to boast, "I've got doves coming out my armpits."

23 I know these things because I was a candidate for mayor; not a journalistic observer, but a  
24 participant. I crossed the line dividing citizen and politician and entered the twisted world of San  
25 Francisco electoral politics, analogous in every way to the Twilight Zone. It is a world closer to the  
26 double dealing of the Middle East than to the values of middle America—a world where money is  
27 regent and the commitments that count are the ones that ring the cash register. And yet it's an  
28 amazingly personal world where the loyalties and hatreds that shape the campaign come from real,

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1 or imagined, hurts of years past. Just say no, I reply, when people ask me why anyone would run for  
2 mayor.

3 My decision to run had a lot to do with being born and raised in this town and thinking that  
4 the vision of the old city was being dirtied and chiseled by the politicians. There was a pervasive  
5 feeling, shared by many, that San Francisco deserved better than it was being offered in this  
6 election, or, perversely, that it was getting just what it deserved. I thought the city was getting short-  
7 sheeted, and that in the last free-for-all election we will see in many a year, some idiot had better  
8 jump in there and give the politicians what for. As it turned out, I was that idiot.

9 Yet this mayoral race, for all of its nightmarish big-bucks elements, has brought a few real  
10 changes. Who would have imagined a year ago that the election of 1987 would see:

- 11 • The nationally-hyped Feinstein regnant go out with a whimper, the city busted  
12 financially and Madame Mayor unable to deliver for either Molinari or the Giants stadium,  
13 her two final lost causes.
- 14 • Herb Caen losing it by putting his healthy cynicism aside and his 50 years of power  
15 on the line for a dice-playing buddy named Jack “Millionari” Molinari. Meantime, the young  
16 columnist for the afternoon paper went for Agnos, making Mr. San Francisco look like Mr.  
17 Milpitas.
- 18 • Political control of San Francisco shifting from the Feinstein/Molinari lazy bucks,  
19 let-’em-build-skyrises clique to the Sacramento moneybags machine headed by Assembly  
20 Speaker Willie Brown, the new power behind the Agnos throne.
- 21 • The entrance fee for any serious run for mayor of San Francisco becoming a cool  
22 million bucks.

23 Running for mayor of San Francisco was an exhilarating, exhausting, dreadful, extremely  
24 informative and sometimes hilarious experience. At a party thrown by a left-wing Valencia Street  
25 bookstore, a worker at McAuley Neuropsychiatric Institute came up to me and said he had great  
26 news. He had polled six people at the hospital and all six had said they were going to vote for me as  
27 the candidate who cared most for the poor and the homeless. That was encouraging, I said. Were  
28 these six of his co-workers? No, he said, crestfallen, they were inmates.



1 When you don't have a million bucks like your rivals, you have to think up gimmicks to  
2 draw attention to your candidacy. That's why we developed the official "Hinckle for Mayor"  
3 condoms. They were produced in faraway Thailand and packaged in Tempe, Arizona (sorry, no  
4 union bug), in covers cleverly resembling traditional campaign matchbooks. We gave away  
5 thousands for educational purposes here in the AIDS capital of the country.

6 Good news travels. During a stuffy black-tie fundraiser at the Players Club in New York, I  
7 gave one of the campaign matchbook/condoms to Tom Wolfe, the writer. Tom used to live in San  
8 Francisco and thought this great sport. He bounded across the room to former New York Mayor  
9 John Lindsay and handed him the little package, saying this was from his candidate for mayor.  
10 Lindsay began to slip it politely into his pocket, as one would with matches. Wolfe said, "Wait a  
11 minute, Your Honor, these aren't regular matches, these are from San Francisco." Lindsay looked  
12 down and opened the cover. His tanned chin dropped in horror.

13 -----  
14 **If You're Going To San Francisco...Think Again**

15 **By [Brian C. Joondeph](#)**  
16

17 A few decades ago, Scott McKenzie sang one of the classic hippie [anthems](#), "San Francisco," back  
18 in 1967. It was sung during the heyday of sex, drugs, and rock and roll. Flower power was the rage.  
19 Peace, love, and understanding were the mantras of the day, in response to the Viet Nam War and  
20 the oppression of The Man.

21 McKenzie sang, "If you're going to San Francisco, be sure to wear some flowers in your hair." Back  
22 then, the flowers were for decoration, to match the tie-dyed clothing and sandals.

23  
24 Flash forward fifty years, and residents of San Francisco may need to wear flowers, not only in their  
25 hair, but also covering their entire bodies. Not for decoration, however, but to mask the odor of a  
26 new feature of the streets of San Francisco. Excrement.

27 And it's been making the national news, a veritable emblem of what the city has become.  
28 The newly inaugurated San Francisco mayor is London Breed, who, as an aside, has a perfect 1960s

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1 name. Interviewed after her inauguration, the Daily Caller noted that she [observed](#) that the streets of  
2 her city "are flooded with the excrement of the homeless."

3 In other words, San Francisco has become Poop City.

4       Apparently this is not a new problem. The famous chronicler of the city, San Francisco  
5 Chronicle columnist Herb Caen, occasionally would use the phrase in his daily screeds during the  
6 1980s and 1990s, but it's far worse now. As the Daily Caller had the new mayor [noting](#): "There is  
7 more feces on the sidewalks than I've ever seen growing up here." And not just poop. Added to the  
8 mix is a "dangerous mix of drug needles, garbage, and feces."

9       Lovely. In 1967, "If you're going to San Francisco, you're gonna meet some gentle people  
10 there." Now you will meet a garbage dump mixed with a cesspool.

11       San Francisco has about 7,500 homeless individuals and is [spending](#) \$280 million on  
12 homeless services for them. Some simple math reveals that the city could give each homeless  
13 resident just over \$37,000 per year, a figure well above the minimum wage in most other places,  
14 and call it a day.

15       If you take out the salaries of all the bureaucrats administering these "homeless services,"  
16 there would likely be more than \$100,000 available for each homeless person. But you know that  
17 won't happen in a Democrat-run city, an administrative state, like San Francisco.

18       How can the city discourage the homeless from using the sidewalks as their toilets? In their  
19 minds, spend more money. The mayor [assured](#) her fellow progressives: "Harsher penalties for  
20 offenders are not on the table." Instead the typical liberal solution, as the mayor promised, came to:  
21 "I work hard to make sure your programs are funded." I wonder if we'll see toilet paper dispensers  
22 popping up on the sidewalks?

23       This situation might seem to be a cross between funny and absurd, but it has economic  
24 consequences far beyond the necessary clean-up. Who might not be going to San Francisco because  
25 of the city's pungent new attractions?

26       Start with conventions? San Francisco has always been a popular convention destination due  
27 to its fairly pleasant weather, its tourist attractions, its world-class restaurants, and of course, the  
28 cable cars. But in its current state, the bloom is off the San Francisco rose.

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1 A major medical association recently cancelled its annual meeting which would have  
2 brought 15,000 attendees and \$40 million to the San Francisco economy,[according](#) to the SF  
3 Chronicle. This, after many years of coming to the city. Think of that. A group of doctors, quite  
4 familiar with feces, needles, and the downtrodden, have said "enough."  
5 These are things doctors can see in the medical ward and prefer to avoid when away from work,  
6 often with family, at a medical conference. It's likely that other trade groups and industries will stay  
7 away from San Francisco as well.

8 Can you blame them? How many U.S. cities provide visitors with a [public defecation map](#) to  
9 help tourists steer clear of piles of poop littering the city's sidewalks? Or which other city can boast  
10 of the 20-pound [bag of poop](#) found a few weeks ago on a city sidewalk?

11 How did things get this bad for the city that Tony Bennett left his heart in? When Tony  
12 recorded that song in the 1950s, San Francisco had a Republican mayor. Their last Republican  
13 mayor, George Christopher, [left office in 1964](#), when the Beatles arrived in America. Since then,  
14 it's been a hard day's night for San Francisco, with nearly sixty years' worth of Democrats running  
15 the show.

16 At a national level, San Francisco is represented by House minority leader Nancy Pelosi,  
17 Senator Dianne Feinstein, and Senator Kamala Harris, all of whom are hard-core liberals. I am quite  
18 confident that there are no piles of poop on the sidewalks in front of their homes.

19 San Francisco is just another of [many U.S. cities](#) run by Democrats, and into the ground.  
20 Even liberal film maker Michael Moore [observed](#) about his home city in Michigan: "Flint has voted  
21 for Dems for 84 straight yrs. What did it get us?"

22 San Francisco is left with virtue-signaling in the name of compassion, tolerance and all the  
23 other liberal claptrap in a bid to try to hide third world conditions on city streets. Aside from visitors  
24 choosing to go anywhere but San Francisco, what about the residents living in such conditions?

25 Warm summer temperatures and open sewers become a microbiology laboratory. Toss in a  
26 bunch of undernourished and unhealthy homeless persons, sharing hypodermic needles, and  
27 pestilence follows. Such a shame for a once-magnificent city.

28 Rather than cleaning up its mess, San Francisco has just this week [banned plastic straws](#).

Poop and hypodermic syringes littering the sidewalks is just fine, but watch out for those nasty little plastic straws.

Once upon a time Scott McKenzie's words rang true, "For those who come to San Francisco, summertime will be a love-in there." Now it's simply America's version of a s\*\*\*hole. Brian C. Joondeph, MD, MPS, a Denver based physician and writer.

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**San Francisco Voters Choose Between a 1000 Percent Tax Increase and a 500 Percent Tax Increase- Nobody Wants To Be In San Francisco Any More** (reason.com)

by [daskapitalist](#) to [politics](#) (+90|-2)

- [comments](#)

**The Bad Decision-Making Of The Drug Fried Minds Of The People That Live In San Francisco**

By Karma Harris

The social echo-chamber is a terrible thing.

Like drones, or robots or sheep, the mindless clones in San Francisco seem to be unable to see that they, in their cult-like quest for "individuality" are doing the exact same idiotic thing that every other San Franciscan is doing:

- **Getting a giant eagle, crown or flower tattoo on their chest above their boobs**
- **Wearing a Fedora hat**
- **Growing a handle-bar mustache or stupid-looking Amish beard**
- **Making their clothes look like they accidentally exposed their look-at-me desperation tattoo**
- **Taking pictures of themselves making idiotic duck lips**
- **Wearing a plaid shirt**
- **Being obese and wearing a belly shirt**
- **Being obese and wearing a tube top**

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- 1 - Being obese and wearing Betty Boop make-up
- 2 - Thinking that heroin makes you look cool
- 3 - Study an "Art Career" at a commercial "Institute" your rich sucker parents pay you to
- 4 smoke pot at
- 5 - Being a grown-up who uses a skate-board or push scooter
- 6 - Wearing a spandex T-Shirt and pursing your lips because you want to be gay and "with it"
- 7 - Using the phrase "sociability nexus" or any other Tech BS-speak
- 8 - Worshiping Google
- 9 - Wearing all black at night because nobody else thought of that
- 10 - Thinking that your "pot cafe" idea is original, unique and will last more than 3 months
- 11 - Paying tens times more for food because it has tofu hidden in it
- 12 - Blindly mouthing any party line pretext that Nancy Pelosi tells them to
- 13 - Getting scabies every weekend at the 1050 Folsom night-club
- 14 - Tweeting as if anything you do matters to anybody
- 15 - Hiding your mental illness by saying and dressing "gender fluid"-like
- 16 - Getting a pack of tattoos that proudly announce your bad decision making
- 17 - Getting a pack of tattoos that proudly announce you are a slut
- 18 - Owning a fluorescent colored bicycle
- 19 - Creating a start-up that sells nothing that anybody actually needs or wants but has an ironic
- 20 name
- 21 - Talking about "Burning Man" with any other sense than shame
- 22 - Going to a "TED Conference" without realizing you are a douche bag
- 23 - Using Match.com to get free dinners
- 24 - Having no ability whatsoever to consider the consequences of your actions
- 25 - Not seeing that the SF Board of Supes are all elitist stock market inside traders abusing the
- 26 City
- 27 - Having six room-mates
- 28 - Pooping in the street because you embrace the "multi-cultural experience"

- 1 - **Having no clue how the real world works**
- 2 - **Being a woman at Stanford University without knowing the Frats just see you as a baby oven**
- 3 - **Being a white yuppie guy with a Chinese girlfriend who doesn't not realize what the real deal**
- 4 **is**
- 5 - **Not knowing why you feel you NEED to go to Starbucks**

6 HOT LINKS FOR INFORMATION UPDATES:

- 7 <http://evidence111.com>
- 8 <https://www.thecreepylines.com>
- 9 <https://www.icij.org>
- 10 <https://stopelonfromfailingagain.com>
- 11 <http://vcracket.weebly.com>
- 12 <https://www.transparency.org>
- 13 <https://www.judicialwatch.org>
- 14 <https://wikileaks.org>
- 15 <https://causeofaction.org>
- 16 <https://fusion4freedom.com/about-gcf/>
- 17 <http://peterschweizer.com/>
- 18 <http://globalinitiative.net>
- 19 <https://fusion4freedom.com/the-green-corruption-files-archive/>
- 20 <https://propublica.org>
- 21 <https://www.allsides.com/unbiased-balanced-news>
- 22 <http://wearethenewmedia.com>
- 23 [http://ec.europa.eu/anti\\_fraud/index\\_en.html](http://ec.europa.eu/anti_fraud/index_en.html)
- 24 <http://gopacnetwork.org/>
- 25 <http://www.iaaca.org/News/>
- 26 <http://www.interpol.int/Crime-areas/Corruption/Corruption>
- 27 <http://www.icac.nsw.gov.au/>
- 28 <http://www.traceinternational.org/>

1 <http://www.oge.gov/>

2 <https://ogc.commerce.gov/>

3 <https://anticorruptionact.org/>

4 <http://www.anticorruptionintl.org/>

5 <https://represent.us/>

6 [http://www.giaccentre.org/dealing\\_with\\_corruption.php](http://www.giaccentre.org/dealing_with_corruption.php)

7 <http://www.acfe.com/>

8 <https://www.oas.org/juridico/english/FightCur.html>

9 <https://www.opus.com/international-anti-corruption-day-businesses/>

10 <https://www.opengovpartnership.org/theme/anti-corruption>

11 <https://www.ethicalsystems.org/content/corruption>

12 <https://sunlightfoundation.com/>

13 <http://www.googletransparencyproject.org/>

14 <http://xyzcase.weebly.com>

15 <https://en.wikipedia.org/wiki/Angelgate>

16 <https://www.opensecrets.org/>

17 [https://en.wikipedia.org/wiki/High-Tech\\_Employee\\_Antitrust\\_Litigation](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation)

18 <http://www.projectveritasaction.com>

19

20 [Catch and Kill](#) By Ronan Farrow,

21 [https://en.wikipedia.org/wiki/Catch\\_and\\_Kill:\\_Lies,\\_Spies,\\_and\\_a\\_Conspiracy\\_to\\_Protect\\_Predato](https://en.wikipedia.org/wiki/Catch_and_Kill:_Lies,_Spies,_and_a_Conspiracy_to_Protect_Predators)  
22 [rs](#)

23 [Permanent Record](#) By Edward Snowden, [https://www.amazon.com/Permanent-Record-Edward-](https://www.amazon.com/Permanent-Record-Edward-Snowden/dp/1250237238)  
24 [Snowden/dp/1250237238](#)

25 [Brotopia](#) By Emily Chang, <http://brotopiabook.com/>

26 [Throw Them All Out](#) By Peter Schweizer, <http://peterschweizer.com/books/throw-them-all-out/>

27 [The Circle](#) By David Eggers, <https://archive.org/details/circle00dave>

28 [World Without Mind](#) By Franklin Foer, <https://www.amazon.com/World-Without-Mind->

1 Existential-Threat/dp/1101981113

2 [A Journey into the Savage Heart of Silicon Valley](#) By Corey Pein,

3 <https://www.goodreads.com/book/show/35684687-live-work-work-work-die>

4 [Disrupted](#) By Dan Lyons, <https://www.goodreads.com/book/show/26030703-disrupted>

5 [Chaos Monkeys](#) By Antonio García Martínez, [https://www.antoniogarciamartinez.com/chaos-](https://www.antoniogarciamartinez.com/chaos-monkeys/)  
6 [monkeys/](#)

7 [The Creepy Line](#) By Matthew Taylor, <https://www.thecreepylines.com/>

8 [The Cleantech Crash](#) By Leslie Stahl, <https://www.cbsnews.com/news/cleantech-crash-60-minutes/>

9 [Congress: Trading stock](#) By Steve Kroft, [https://www.cbsnews.com/news/congress-trading-stock-](https://www.cbsnews.com/news/congress-trading-stock-on-inside-information/)  
10 [on-inside-information/](#)

### 11 **San Francisco Oligarchs, Elitists And Gatekeepers:**

12 If you don't pay bribes and an homage to these people, you get black-listed! If you don't take  
13 the knee to them and put them on your Board of Directors (Like Hunter Biden) they will have you  
14 black-listed, cut-off, de-funded and ostracized in City Hall sponsored reprisal and vendettas:

15 Janet Reilly, Clint Reilly, Ed Lee, John Molinari, Any Member Of Gavin Newsom's Family,  
16 Roger Boas, Dick Blum, Vinod Khosla, Anybody named Haas, Charlotte Maillard, Ed Shultz,  
17 Henry Kissinger, Will Hearst, Nancy Pelosi, Dianne Feinstein, Kathryn Feinstein, Scott Weiner,  
18 Darcy Brown, Stewart Brand, Joseph Costello, Carl Livingston, Henry Adams, Wally McCormick,  
19 Bob McKeen, Jean Bricker, Richard Thieriot, Wilkes Bashford, James Bronkema, Roger Boas,  
20 William Ball, Gordon Bellis, Frances Bowers, Donna Casey, Gretchen Cebrian, Tina Cella,  
21 Lawrence Chickering, Sheldon Cooper, Charles Crocker, Edwin Cutler, Myron Du Bain, Coburn  
22 Everdell, Donna Ewald, John Gamble, William Gaylord, Richard Graff, Reid Hoffman, Ann Getty,  
23 Anthony Hale, Matilda Kunin, Wendy Linka, Mary Moulton, William Newsom, John Owsley,  
24 Bokkara Patterson, Juan Reynal, Steven Swig, Wilfred Von Bulow, Michael Whitman, Brayton  
25 Wilbur, Rita Barela, John Brunelle, John Calori, William Coblentz, Joseph V. Costello, John  
26 Diefenbach, Myron Dubain, Frank Woods, Mort Feld, T. Jack Foster Jr, Gordon P Getty, James  
27 Gilleran, John Goy, Evie Haas, Bryan Hemming, Bruce Demming, Brian Goncher, Steve Spinner,  
28 John Jacobs, Fritz Jewett, Ray Jones, George Keller, Art Kern, Bob Lansdon, Arthur Latno, Robert



1 Leefeldt, Bob Lurie, Malcom MacDonald, Dan McCall, Wallace McCormack, Rich Miller,  
2 Elizabeth Pfau, Florette Pomeroy, David Ringler, Mark Zuckerberg, Hadley Roff, Norman  
3 Rosenblatt, Albert Schlesinger, Steven L. Swig, et al

4 These are the people that decide who gets elected in San Francisco.

5 They trade wives, boyfriends, rent boys and prostitutes.

6 They operate a vicious black-list.

### 7 8 **Palo Alto, California – Home Of The Tech Mobsters**

9 Stanford University graduates are inspired by the likes of corrupt Elon Musk and corrupt  
10 Italian Prime Minister Silvio Berlusconi—the forerunner of the media-manipulating populist-  
11 criminal-strongman trend that’s recently swept through Western nations—or passages discussing  
12 Facebook, Twitter and Google’s prioritization of profit over their responsibility to safeguard  
13 democracy from hate speech and disinformation. Eric Schmidt, Larry Page, Elon Musk, Jack  
14 Dorsey, Reid Hoffman, John Doerr, Vinod Khosla and Mark Zuckerberg are the embodiment of this  
15 problem, given that their flouting of rules and standards of common decency—has made it appear  
16 acceptable, and in fact rewarding, to act in the worst possible manner as a means of achieving one’s  
17 selfish ends. Their Silicon Valley is the pit of American assholery.

18 To grasp that argument, one need only listen to Silicon Valley Assholes: A Theory’s basic  
19 description of an asshole. As many state, “The asshole is the guy who allows himself special  
20 advantages in Bay Area cooperative life out of an entrenched sense of entitlement that immunizes  
21 him against the complaints of other people.” In other words, he’s the individual—generally male,  
22 although as John Cleese candidly admits, his mother probably was one too—who thinks the general  
23 rules don’t apply to them because they’re somehow smarter, better, or more special than their fellow  
24 citizens. James’ example is a surfer who violates the right-of-way customs in the ocean. Yet the  
25 type is universal, whether in line at the grocery store, on the road in traffic, or at work. They’re the  
26 arrogant creeps convinced they’re fundamentally superior, and thus free to conduct themselves in  
27 whatever way they see fit. That IS the essence of such attitudes, according to the Silicon Valley  
28 Assholes Process aren’t confined to law enforcement. Stanford University Fraternities are breeding

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1 grounds for horrid group-think mindsets about women and sex. The tech financial sector encourages  
2 greed, ruthlessness, and vulgarity as the best way to get ahead. Google executives champion  
3 initiation-ritual abuse in service of its own greater good. You can see the movies: Animal House,  
4 The Wolf of Wall Street and Full Metal Jacket to see the underscore of the notion that these milieus  
5 are all rife with a similar brand of assholery in which arrogance and entitlement justify all manner  
6 of despicable ideas and deeds. Every major rape fraternity in the USA eventually sent those abusive  
7 boys to run Sandhill Road venture capital companies and Google or Facebook departments.

8       The most compelling—and enraging—realities concerns Silicon Valley, where Mark  
9 Zuckerberg and like-minded CEOs have bred a culture of trampling on competitors, laws, historical  
10 norms, and the bedrock tenets of democracy in pursuit of additional eyeballs, clicks, and revenue  
11 streams. In a place where young men team up in a desperate quest to develop the innovative next  
12 big thing that'll turn them into tech moguls (“bro-gramming”), nothing matters but the self-centered  
13 end goal. And though Facebook, Twitter, Google, Kleiner Perkins, Greylock and their ilk could  
14 alter this landscape by simply cracking down on the horridness that permeates their platforms, they  
15 choose not to because of the negative financial consequences and their lust for hookers, private jets  
16 and cocaine.

## EXHIBIT 33 – How They Ran The Scams

The public must continue to terminate these felony organized crimes by major public officials and [Silicon Valley oligarch tech mobsters!](https://www.breitbart.com/tech/2020/08/31/deleted-big-techs-battle-erase-trump-movement-steal-election/) ( <https://www.breitbart.com/tech/2020/08/31/deleted-big-techs-battle-erase-trump-movement-steal-election/> )

taxpayers must use the internet to publicly shame them! The public must boycott their companies and crash their stock! Voters must demand their arrests and indictments. Citizens must join together in one voice to make it illegal for politicians to own stock because [that is how bribes are now paid!](https://www.yahoo.com/lifestyle/insider-trading-rife-no-regulators-090007170.html) ( <https://www.yahoo.com/lifestyle/insider-trading-rife-no-regulators-090007170.html> )

State and federal officials defrauded citizens out of millions of dollars of their life-savings and then attacked those taxpayers for reporting the crimes! those officials then put the profits and stock market funds from those crimes in their own, and their families, corrupt [monopoly](https://www.msn.com/en-us/money/markets/monopoly-power-lies-behind-worst-trends-in-us-fed-study-says/ar-BB186Jq0?ocid=uxbndlbing) pockets! ( <https://www.msn.com/en-us/money/markets/monopoly-power-lies-behind-worst-trends-in-us-fed-study-says/ar-BB186Jq0?ocid=uxbndlbing> )

**Their attacks against individuals were their downfall.** FBI-class forensic evidence has shown that there were only a few people who could have operated, financed and run command-and-control of the attacks. The money, the bribes, the beneficiary profit tracings, the instructions, their covert communications, the stock market owner-ships, etc.; all trace back to the same handful of people who are all business and political manipulation partners. Their attacks boomeranged back to point straight at the attackers! The evidence is clear!

It seems like the stonewalling never ends. Famous California and Washington DC politicians ran these crimes along with big tech oligarchs!

**Huge cover-ups** ( <https://www.documentcloud.org/documents/6827837-States-Newsroom-1023-Application-Materials.html> ) are underway but they will never be allowed to get away with it! they are being exposed by these crowd-sourced investigations that use 100% legal law enforcement and intelligence technologies !

**U.S. Government Proves That Rogue CIA And FBI Agents Exist And Use Government Agencies For Revenge Hit Jobs; Just As Plaintiffs Asserted When Plaintiffs Proved SSA, DOJ, GOVT Agencies Found To Run Vendettas On Citizens Who Spoke Up About Corruption - Durham Case! ( <https://townhall.com/tipsheet/katiepavlich/2020/08/14/breaking-the-first-durham-indictment-is-here-n2574370> )**

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*Jeffrey Epstein* is dead, *Raj gupta* has been jailed, *Steve Rattner* was indicted, *James Bronkema* is dead, *Roger Boas* is dead....but those were just the *tip of the ice-berg*. *Eric Schmidt*, *Larry Page*, *Elon Musk* and their crooked senators are still running around doing the same old crimes and corruption via their network of dirty tricks operatives.

In one of the whistle-blower complaints about State and Federal officials conduct in stimulus programs, Plaintiffs made repeated attempts to inform executive leadership and legal advisers about questionable activities of those officials. Plaintiffs have all of the needed additional evidence to back up their allegations against these officials.

Concerned parties have been blocked from reporting the activity to Offices of Legal Affairs, in violation of the law. In retribution, A number of parties had tax-payer financed revenge programs launched against them using State and Federal resources. Plaintiffs directly witnessed much of the behavior and reported it, personally, to the FBI at their offices. Plaintiffs have made top law enforcement and intelligence officials aware of these concerns on repeated occasions. To Plaintiffs knowledge, none of the agencies ever took action to resolve the issues, and several of them specifically directed subordinate staff to continue facilitating questionable activities after the concerns were raised. Plaintiffs witnessed the concerning activities in Washington, D.C., New York, California and in activities with overseas parties.

White House Staff including Rahm Emanuel, Bill Daley, Jay Carney, Robert Gibbs, Steve Rattner, David Axelrod, John Podesta, et al; and The Secretary of Energy Steven Chu and the Chief Counsel for the United States Department of Energy Daniel Cohen and Bill Cooper were, (from 2007 forward), either financed by, friends, with, sleeping with, dating the staff of, holding stock market assets in, promised a revolving door job or government service contracts from, partying

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with, personal friends with, photographed at private events with, exchanging emails with, business associates of or directed by; Plaintiffs business adversaries, or the Senators and Department of Energy politicians that those business adversaries pay campaign finances to, or supply political digital search manipulation services to. Criminal U.S. Senators coordinated and profited in these schemes. Their own family members have now supplied evidence against them. Nobody is allowed to "win" government funds unless they are friends and stock market partners with certain U.S. Senators. Even if your application metrics beat every single other competing Applicant, you will get lied to and defrauded by Department of Energy and White House officials. You will be told that you have a "fair chance", **but** all of the money is secretly hard-wired to a business partner of a Pelosi or Feinstein and you will just waste your time, staff resources and payroll waiting for years on promised funds that will never come.

From 2007 forward, The White House and The U.S. Government were controlled by the Silicon Valley tech oligarchs for monopolistic profiteering! (ie: You could not swing a cat in the Obama White House without hitting a Google executive or an ex-lover of Eric Schmidt) That is a violation of the law, the Constitution and the American Way.

**SEE THIS REPORT TO CONGRESS:**

[How Google Controls Government Policy And Process In America FREE.pdf](#)

( <http://american-corruption.com/How%20Google%20Controls%20Government%20Policy%20And%20Process%20In%20America%20FREE.pdf> )

[GOGGLE HAS BRIBED EVERY POLITICIAN](#); HOW DO THEY GET AWAY WITH SUCH CORRUPTION?... " ( <https://www.theamericanconservative.com/articles/the-conservative-inc-to-big-tech-pipeline/> )

**The Silicon Valley High-Tech Black-Listing Antitrust Litigation And Big Tech's Attacks On Democracy**

*"...Who are the criminal mobsters of Silicon Valley's democracy manipulation millionaires*

and billionaires known as "**The Commission**" (Also known as "The Paypal Mafia", The "Deep State", "The Silicon Valley Cartel")? Who are the elitist tax evader, sex freak, money-laundering, **black-list** ( <https://www.mediaite.com/news/ex-google-engineer-says-glitch-blocking-websites-including-drudge-breitbart-could-have-revealed-a-mysterious-list/> )operating, Senator bribing, off-shore cash hiding, election rigging insiders who manipulate the system for their own insider trading schemes: Reid Hoffman, Larry Page, Sergy Brin, Elon Musk, Dustin Moskovitz, Mark Zuckerberg, Eric Schmidt, Laurene Powell Jobs, Steve Spinner, Steve Westly, Vinod Khosla, Andy Bechtolsheim, Brian Goncher, Cheryl Sandberg, David Drummond, Andy Rubin, David Plouffe, Tim Draper, Jeffrey Epstein, Gilman Louie, Ira Ehrenpreis, Tim Cook, McKinsey Consulting, Deloitte, Goldman Sachs, Jerry Brown, Richard Blum, James Breyer, John Podesta, Joe Lonsdale, John Doerr, Keith Rabois, Marc Andreessen, George Soros, Mario Rosatti, Martin LaGod, Michael Moritz, Viktor Vekselberg, Larry Summers, Pierre Omidyar, Tom Steyer, Steve Jurvetson, Steve Rattner and their CARTEL including their crooked lawyers and lobbyist mobs! They have "command and control and exclusive-beneficiary positions in ongoing, coordinated, criminal and anti-trust activities involving government and stock market funds...". Their crimes financially benefited Dianne Feinstein, Nancy Pelosi, Jerry Brown, Kamala Harris and Barack Obama and their stock market holdings, while harming their competitors on purpose. The securities and stock market records prove that it was crony corruption and payola. The sex crime victims of Cartel member [Jeffrey Epstein](https://www.dailymail.co.uk/news/article-8639501/Bill-Clinton-smiles-receiving-neck-massage-Jeffrey-Epstein-victim.html) ( <https://www.dailymail.co.uk/news/article-8639501/Bill-Clinton-smiles-receiving-neck-massage-Jeffrey-Epstein-victim.html> ) reported him to the DOJ a decade ago, yet nothing was done. Plaintiffs reported this Cartel in 2008, STILL, nothing has been done! These people have run a stock market and government funding State and Federal PONZI SCHEME in every "stimulus" from 2008 forward! They use free government money, stock valuation pump-and-dump and black-lists to make certain that no competitor can ever operate against them in any market. The more that the California Senators get to control Congress, the more they get to push laws that benefit companies owned by their spouses! By filling California up with illegal immigrants, enticed by the offer of "free stuff", Dianne and Nancy get to control federal policy by manipulating the census numbers. By controlling government decisions, Nancy and Dianne get to give taxpayer money to their friends

(Elon Musk, Eric Schmidt, Mark Zuckerberg, etc, who they own stock with) and deny that money to their competitors. They [have a covert news and media network](https://www.opensecrets.org/news/2020/05/dark-money-networks-fake-news-sites/) ( <https://www.opensecrets.org/news/2020/05/dark-money-networks-fake-news-sites/> ) that hides all news coverage about the crimes. Illegal immigrants equal control of the stock market profits for Nancy's, Kamala's and Dianne's investment banker husbands. It is as simple as that!..."

## **HOW THE U.S. DEPARTMENT OF ENERGY AND CALIFORNIA SENATORS CREATED THE LARGEST INSIDER TRADING SCHEME IN HISTORY**

Companies in PR-hype industries sometimes have a history of [reinventing themselves](https://www.ft.com/content/8c46ff08-5522-469e-bc6c-4be08cdf9828) ( <https://www.ft.com/content/8c46ff08-5522-469e-bc6c-4be08cdf9828> ). For Tesla Motors and Solyndra the potential transition from start-up to future energy monopoly was being facilitated by the government. Now Kodak has copied this corruption scam. The **U.S. DEPARTMENT OF ENERGY (GOVT)** [signed a letter of interest](https://www.dfc.gov/media/press-releases/dfc-sign-letter-interest-investment-kodaks-expansion-pharmaceuticals) ( <https://www.dfc.gov/media/press-releases/dfc-sign-letter-interest-investment-kodaks-expansion-pharmaceuticals> ) to provide hundreds of millions in favored-nation 'loans' to them to support the company's plans to produce green energy things for the U.S. domestic market. Thereafter, a series of ensuing events raised concerns about potentially illegal insider trading, and of an uneven level playing field for investors in U.S. stock markets. The immediate response by U.S. Congress was to investigate. The new KODAK Covid loan is the same kind of crime, which insiders learned they could get away with in the Obama **U.S.**

## **DEPARTMENT OF ENERGY.**

Whether the suspicious trading activity is a case of illegal insider trading activity is difficult to judge without further scrutiny by prosecutors. However, these new types of substantial loans from the government to private companies give rise to a new type of private information. While traditional corporate events, such as earnings announcements or corporate takeovers, are subject to strict rules about the disclosure of information and reporting requirements, it appears that the disbursement of government subsidies and grants falls into a grey area not effectively covered by existing rules. Thus, it is necessary to consider more transparent and consistent protocols on information disclosure to avoid providing unfair advantages to a select group of company insiders

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1 including California Senators and Energy Department staff.

2 Just one day before the official announcement of the loan, on July 27, Kodak's stock price  
3 jumped by about 25 percent on a trading volume of 1,645,719 shares, over five times the average  
4 daily trading volume in prior months. These unusual trading activities were likely [attributable to the  
5 premature release of the news by several media outlets](https://www.wsj.com/articles/tweets-and-articles-sent-kodak-shares-surgin-before-official-announcement-11596056729). ( [https://www.wsj.com/articles/tweets-and-  
6 articles-sent-kodak-shares-surgin-before-official-announcement-11596056729](https://www.wsj.com/articles/tweets-and-articles-sent-kodak-shares-surgin-before-official-announcement-11596056729) )

7 Unusual trading activity also occurred in Kodak's stock options, even prior to the news  
8 leakage. The trading volume was especially strong in out-of-the-money (OTM) call options, which  
9 are set to profit especially from a positive jump in stock prices, with daily trading volumes of all  
10 OTM call options on July 17, 20 and 27 that was more than ten times larger than average volumes  
11 since the beginning of 2020.

12 Kodak's executives and board members are also linked to controversial transactions. About  
13 one month before the announcement, on June 23, the company's executive chair and a  
14 director [purchased over 50,000 shares](https://www.sec.gov/cgi-bin/browse-edgar?action=getcompany&CIK=0000031235&type=4) ( [https://www.sec.gov/cgi-bin/browse-edgar?  
15 action=getcompany&CIK=0000031235&type=4](https://www.sec.gov/cgi-bin/browse-edgar?action=getcompany&CIK=0000031235&type=4) ) of the company's stock a day during the time  
16 when the company was negotiating loans with the government. In addition, four executives  
17 were [granted stock options right on July 27](https://www.wsj.com/articles/kodaks-stock-surge-turned-insiders-options-into-potential-windfall-11596220862), ( [https://www.wsj.com/articles/kodaks-stock-surge-  
18 turned-insiders-options-into-potential-windfall-11596220862](https://www.wsj.com/articles/kodaks-stock-surge-turned-insiders-options-into-potential-windfall-11596220862) ) just one day before the stock price  
19 skyrocketed. Prior to another major stock price drop, due to a freezing of the Kodak loan associated  
20 with the congressional investigation, a board [member donated \\$116 million](https://www.ft.com/content/6e7494c4-56cd-4121-8027-ecfc9586958c) ( <https://www.ft.com/content/6e7494c4-56cd-4121-8027-ecfc9586958c> ) in company shares,  
21 entitling the donors to a substantial tax deduction.

22  
23 These events have alerted legislators and raised concerns that trades of investors may  
24 explain the suspicious activity with access to material non-public information. On August 3, Sen.  
25 [Elizabeth Warren](https://www.warren.senate.gov/imo/media/doc/2020.08.03%20Letter%20to%20SEC%20re%20Kodak%20stock%20trades.pdf) (D-Mass.) formally [requested the Securities and Exchange Commission \(SEC -  
26 https://www.warren.senate.gov/imo/media/doc/2020.08.03%20Letter%20to%20SEC%20re  
27 %20Kodak%20stock%20trades.pdf\)](https://www.warren.senate.gov/imo/media/doc/2020.08.03%20Letter%20to%20SEC%20re%20Kodak%20stock%20trades.pdf) to [investigate](#) the possibility of insider trading and violation of  
28 regulatory compliance rules. Two House committee chairs also launched their own



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1 inquiries, [requesting detailed records](#) from the loan provider, DFC. (  
2 [https://financialservices.house.gov/uploadedfiles/2020.08.04\\_h\\_cmtes\\_ltr\\_to\\_dfc.pdf](https://financialservices.house.gov/uploadedfiles/2020.08.04_h_cmtes_ltr_to_dfc.pdf))

3 Besides these valid outcries due to concerns about the potential for illegal insider trading,  
4 this turn of events raises a question of broad public interest. Why was the usual protocol for the  
5 enforcement of news disclosure and insider trading regulations around corporate events not  
6 followed in this case? The announcement of the government-sponsored Kodak loan is no different  
7 from traditional corporate events, such as earnings disclosures, announcements of mergers and  
8 acquisitions, spinoffs, or new product announcements. It also involves secret negotiations in  
9 executive offices that give rise to the potential for trading on privileged information.

10 In the Kodak case, the private information was indeed material. The \$765 million  
11 government loan it received amounts to 54 percent of the company's total assets, 78 percent of its  
12 annual revenue, and is 64 times larger than its annual operating cash flows, according to its [most](#)  
13 [recent 10-K filing](#). ( [https://www.sec.gov/Archives/edgar/data/31235/000156459020011408/kodk-](https://www.sec.gov/Archives/edgar/data/31235/000156459020011408/kodk-10k_20191231.htm)  
14 [10k\\_20191231.htm](https://www.sec.gov/Archives/edgar/data/31235/000156459020011408/kodk-10k_20191231.htm) ) It is not surprising that such news boosted the stock price from about \$2 to  
15 \$60 in a matter of days. Another related issue is that the DFC and Kodak did not release the news at  
16 the same time. This lack of consistency in information disclosure makes it difficult to pinpoint when  
17 the information was publicly available.

18 The Kodak experience was not unique. The [massive monetary and fiscal](#)  
19 [interventions](#) ( <https://www.imf.org/en/Topics/imf-and-covid19/Policy-Responses-to-COVID-19> )  
20 that have been announced in the U.S., Europe and elsewhere are likely to lead to similar types of  
21 sensitive news releases. The difference with respect to more traditional corporate announcements is  
22 that the government has a seat at the table. U.S. officials and their counterparts elsewhere are  
23 picking winners and losers in the disbursement of grants, loans and contracts. Thus, a new source of  
24 privileged information has emerged that raises the possibility that insiders may well profit from  
25 possession of such information before it is released to the market.

26 In The U.S. Government Cleantech Crash political payola quid pro quo, government money  
27 was used by Goldman Sachs and their clients for the following scams, EVERY SINGLE ONE OF  
28 WHICH was used in the Dept of Energy ATVM AND LGP funds manipulations.

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**EXHIBIT 34 - The Cartel's Bribes Using The Stock Market Are The Main Source Of Payola**

*Every One* of these [financial scam tricks](https://www.sec.gov/files/Algo_Trading_Report_2020.pdf) ( [https://www.sec.gov/files/Algo\\_Trading\\_Report\\_2020.pdf](https://www.sec.gov/files/Algo_Trading_Report_2020.pdf) ) is used **daily** by the suspects in this case:

**\*\* The Silicon Valley Stock Scam Called: "Pools"**

Agreements, often written, among a group of traders to delegate authority to a single manager to trade in a specific stock for a specific period of time and then to share in the resulting profits or losses." [5] In Australia section 1041B prohibits pooling. ( [https://en.wikipedia.org/wiki/Market\\_manipulation#cite\\_note-5](https://en.wikipedia.org/wiki/Market_manipulation#cite_note-5) )

**\*\* The Silicon Valley Stock Scam Called: "Churning"**

When a trader places both buy and sell orders at about the same price. The increase in activity is intended to attract additional investors, and increase the price.

**\*\* The Silicon Valley Stock Scam Called: "Stock bashing"**

This scheme is usually orchestrated by savvy online message board posters (a.k.a. "Bashers") who make up false and/or misleading information about the target company in an attempt to get shares for a cheaper price. This activity, in most cases, is conducted by posting libelous posts on multiple public forums. The perpetrators sometimes work directly for unscrupulous Investor Relations firms who have convertible notes that convert for more shares the lower the bid or ask price is; thus the lower these Bashers can drive a stock price down by trying to convince shareholders they have bought a worthless security, the more shares the Investor Relations firm receives as compensation. Immediately after the stock conversion is complete and shares are issued to the Investor Relations firm, consultant, attorney or similar party, the basher/s then become friends of the company and move quickly to ensure they profit on a classic Pump & Dump scheme to liquidate their ill-gotten shares. (see P&D)

**\*\* The Silicon Valley Stock Scam Called: "Pump and dump"**

1 A pump and dump scheme is generally part of a more complex grand plan of market  
 2 manipulation on the targeted security. The Perpetrators (Usually stock promoters) convince  
 3 company affiliates and large position non-affiliates to release shares into a free trading status as  
 4 "Payment" for services for promoting the security. Instead of putting out legitimate information  
 5 about a company the promoter sends out bogus e-mails (the "Pump") to millions of unsophisticated  
 6 investors (Sometimes called "Retail Investors") in an attempt to drive the price of the stock and  
 7 volume to higher points. After they accomplish both, the promoter sells their shares (the "Dump")  
 8 and the stock price falls, taking all the duped investors' money with it.

### 9 **\*\* The Silicon Valley Stock Scam Called: "Runs"**

10 When a group of traders create activity or rumours in order to drive the price of a security  
 11 up. An example is the Guinness share-trading fraud of the 1980s. In the US, this activity is usually  
 12 referred to as *painting the tape*.<sup>[6]</sup> Runs may also occur when trader(s) are attempting to drive the  
 13 price of a certain share down, although this is rare. (see Stock Bashing) (

14 [https://en.wikipedia.org/wiki/Guinness\\_share-trading\\_fraud](https://en.wikipedia.org/wiki/Guinness_share-trading_fraud) )

### 15 **\*\* The Silicon Valley Stock Scam Called: "Ramping (the** 16 **market)"**

17 Actions designed to artificially raise the market price of listed securities and give the  
 18 impression of voluminous trading in order to make a quick profit.<sup>[7]</sup> (

19 [https://en.wikipedia.org/wiki/Market\\_manipulation#cite\\_note-7](https://en.wikipedia.org/wiki/Market_manipulation#cite_note-7) )

### 20 **\*\* The Silicon Valley Stock Scam Called: "Wash trade"**

21 In a wash trade the manipulator sells and repurchases the same or substantially the same  
 22 security for the purpose of generating activity and increasing the price.

### 23 **\*\* The Silicon Valley Stock Scam Called: "Bear raid"**

24 In a bear raid there is an attempt to push the price of a stock down by heavy selling or short  
 25 selling.<sup>[8]</sup> ( [https://en.wikipedia.org/wiki/Market\\_manipulation#cite\\_note-8](https://en.wikipedia.org/wiki/Market_manipulation#cite_note-8) )

### 26 **\*\* The Silicon Valley Stock Scam Called: "Lure and Squeeze"**

27 This works with a company that is very distressed on paper, with impossibly high debt,  
 28 consistently high annual losses but very few assets, making it look as if bankruptcy must be

imminent. The stock price gradually falls as people new to the stock short it on the basis of the poor outlook for the company, until the number of shorted shares greatly exceeds the total number of shares that are not held by those aware of the lure and squeeze scheme (call them "people in the know"). In the meantime, people in the know increasingly purchase the stock as it drops to lower and lower prices. When the short interest has reached a maximum, the company announces it has made a deal with its creditors to settle its loans in exchange for shares of stock (or some similar kind of arrangement that leverages the stock price to benefit the company), knowing that those who have short positions will be squeezed as the price of the stock sky-rockets. Near its peak price, people in the know start to sell, and the price gradually falls back down again for the cycle to repeat.

**\*\* The Silicon Valley Stock Scam Called: "Quote stuffing"**

Quote stuffing is made possible by high-frequency trading programs that can execute market actions with incredible speed. However, high-frequency trading in and of itself is not illegal. The tactic involves using specialized, high-bandwidth hardware to quickly enter and withdraw large quantities of orders in an attempt to flood the market, thereby gaining an advantage over slower market participants.<sup>[9]</sup> ( [https://en.wikipedia.org/wiki/Market\\_manipulation#cite\\_note-9](https://en.wikipedia.org/wiki/Market_manipulation#cite_note-9) )

**\*\* The Silicon Valley Stock Scam Called: "Cross-Product Manipulation"**

A type of manipulation possible when financial instruments are settled based on benchmarks set by the trading of physical commodities, for example in United States Natural Gas Markets. The manipulator takes a large long (short) financial position that will benefit from the benchmark settling at a higher (lower) price, then trades in the physical commodity markets at such a large volume as to influence the benchmark price in the direction that will benefit their financial position.

**\*\* The Silicon Valley Stock Scam Called: "Spoofing (finance)"**

Spoofing is a disruptive algorithmic trading entity employed by traders to outpace other market participants and to manipulate commodity markets. Spoofers feign interest in trading futures, stocks and other products in financial markets creating an illusion of exchange pessimism in the futures market when many offers are being cancelled or withdrawn, or false optimism or demand when many offers are being placed in bad faith. Spoofers bid or offer with intent to cancel

1 before the orders are filled. The flurry of activity around the buy or sell orders is intended to attract  
2 other [high-frequency traders](#) (HFT) to induce a particular market reaction such as manipulating the  
3 market price of a security. Spoofing can be a factor in the rise and fall of the price of shares and can  
4 be very profitable to the spoofer who can time buying and selling based on this manipulation.

5 **\*\* The Silicon Valley Stock Scam Called: "Price-Fixing"**

6 A very simple type of fraud where the principles who publish a price or indicator conspire to  
7 set it falsely and benefit their own interests. [The Libor scandal](#) for example, involved bankers  
8 setting the [Libor](#) rate to benefit their trader's portfolios or to make certain entities appear more  
9 creditworthy than they were.

10 **\*\* The Silicon Valley Stock Scam Called: "High Closing  
11 (finance)"**

12 High closing is an attempt to manipulate the price of a security at the end of trading day to  
13 ensure that it closes higher than it should. This is usually achieved by putting in manipulative trades  
14 close to closing.

15 **\*\* The Silicon Valley Stock Scam Called: "Cornering the  
16 market"**

17 In [cornering the market](#) the manipulators buy sufficiently large amount of a commodity so  
18 they can control the price creating in effect a [monopoly](#). For example, the brothers [Nelson Bunker](#)  
19 [Hunt](#) and [William Herbert Hunt](#) attempted to corner the world [silver](#) markets in the late 1970s and  
20 early 1980s, at one stage holding the rights to more than half of the world's deliverable silver.[\[10\]](#) ( [https://en.wikipedia.org/wiki/Market\\_manipulation#cite\\_note-TEXAS-10](https://en.wikipedia.org/wiki/Market_manipulation#cite_note-TEXAS-10) ) During the Hunts'  
21 accumulation of the precious metal, silver prices rose from \$11 an ounce in September 1979 to  
22 nearly \$50 an ounce in January 1980.[\[11\]](#) ( [https://en.wikipedia.org/wiki/Market\\_manipulation#cite\\_note-NYT-11](https://en.wikipedia.org/wiki/Market_manipulation#cite_note-NYT-11) ) Silver prices ultimately  
23 collapsed to below \$11 an ounce two months later,[\[11\]](#) much of the fall occurring on a single day  
24 now known as [Silver Thursday](#), due to changes made to exchange rules regarding the purchase of  
25 commodities on margin.[\[12\]](#) ( [https://en.wikipedia.org/wiki/Market\\_manipulation#cite\\_note-](https://en.wikipedia.org/wiki/Market_manipulation#cite_note-TimeBubble-12)  
26 [TimeBubble-12](#) )  
27  
28

**\*\* The Silicon Valley Stock Scam Called: "The Conduit Double Blind"**

In this scam, government money is given to a Tesla, Solyndra, etc. who then money launder the cash through executive-held 501 c3 and c4 charities; and company assets and then provide **DARK MONEY** cash and services to political campaigns like Obama and Clinton election funds. In the case of Tesla, Google (an investor and boyfriend of Musk) supplied billions of dollars of web search rigging. Stock ownership in the companies and deals is traded for campaign funds. David Brock is a master of this kind of Dark Money money-laundering for political campaigns using PACS and pass-through spoofing.

Tesla and Solyndra investors have used ALL of the above tactics and more. Goldman Sachs and JP Morgan have thousands of staff who PROVIDE these stock market manipulation tricks to people like Elon Musk, Larry Page, Eric Schmidt, et al. These kinds of financial crimes and corruption account for the manipulation of over **ONE TRILLION DOLLARS** of ill-gotten profits annually!

Given the massive stimulus packages that are in force today and expected to be implemented going forward, regulators need to set clear guidelines for how and when such privileged information can be disclosed, and impose rigorous trading restrictions for investors with access to private information. Failure to do so always gives unfair advantage to some and damages the level playing field in financial markets.

To avoid providing such unfair advantage to selected executives, the SEC and the Department of Justice need to develop new procedures to incorporate potential illegal transactions derived from information about government intervention through diverse channels. Plaintiffs advocate for a more transparent and consistent protocol on information disclosure regarding government's loan programs to prevent similar events from recurring. For example, the government could channel the release of news about COVID-19-related stimulus interventions through a common platform to prevent leakage from diverse sources and reduce information asymmetry among investors.

The DFC loan to Kodak is the first of its kind under the Defense Production Act but not the

1 first ever because GOVT already created the pump-and-dump scheme for tech oligarchs. Nobody  
2 should be surprised by Kodak trying a proven corruption scam. Since we are in unprecedented  
3 times, government agencies and regulators need to make changes to adapt to the current situation  
4 and fulfill their mission to ensure a level playing field for investors even during this difficult period.  
5 Regulation never happens in these scams because most California Senators and their families profit  
6 from these crimes and corruption.

7 **The indisputable facts here are the assertions that the Silicon**  
8 **Valley oligarchs:**

- 9 1. Control business and politics like a crime Cartel, and...
- 10 2. Are a white male fraternity who attack outsiders in organized and group-planned manners,  
11 and...
- 12 3. Come from dynastic families that systematically ran them through Stanford, Harvard and  
13 Yale men's clubs, and...
- 14 4. Were socially trained and programmed to operate in a closed, tribal, exclusionary manner,  
15 and...
- 16 5. Operated the "Angelgate" collusion scandal, the "Solyndra Scandal", etc., and...
- 17 6. Operated the "Silicon Valley High Tech Employee Collusion" for which they were sued  
18 in a famous class-action case, and...
- 19 7. Controlled the Obama Administration and the Obama White House and traded most key  
20 staff, back-and-forth, with that Administration, and...
- 21 8. Have been sued, indicted and charged in divorce proceedings with an unusually massive  
22 amount of sex trafficking matters, and...
- 23 9. Use the same 10 law-firms who have been charged with public policy manipulation,  
24 bribery and lobbying, and...
- 25 10. Control internet news, media and information, and...
- 26 11. "Own" certain U.S. Senators by virtue of direct bribe payments and securities/stock  
27 payola payments, and...
- 28 12. Use a variety of tools like GUST, Private Google Docs sites, covert Facebook pages and



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1 similar, to secretly conspire and plan collusion and organized monopolistic practices, and...

2 13. Have their venture capitalists spy on entrepreneurs and copy their technology to be  
3 deployed by Google, or Facebook under a new name, and...

4 14. Have over 150+ fake "charity" and hidden shell corporation entities that conduit money  
5 to political interests that promise to increase the oligarchs stock market valuations, and...

6 15. Are financing and using Jeffrey Epstein's, NXVIUM and many other underage sex cult's,  
7 and...

8 16. Are an interstate Mafia-like criminal organization operating in violation of felony-class  
9 organized crime laws, and...

10 17. Have hired the largest number of K Street and Sacramento lobbyists and political  
11 manipulators in history, and...

12 18. Are connected to multiple suspicious deaths from Seth Rich, to Gary Conley, to Rajeev  
13 Motwani, and many more, and...

14 19. Have had their [secret files hacked by the Feds](https://www.cnbc.com/2020/07/30/apple-amazon-facebook-google-internal-emails-released-by-congress.html) (  
15 [https://www.cnbc.com/2020/07/30/apple-amazon-facebook-google-internal-emails-released-by-](https://www.cnbc.com/2020/07/30/apple-amazon-facebook-google-internal-emails-released-by-congress.html)  
16 [congress.html](https://www.cnbc.com/2020/07/30/apple-amazon-facebook-google-internal-emails-released-by-congress.html)) and Chinese and Russian hackers (offered for sale on the Dark Web), and... more...

17 There are over 320 million people in America and the handful of people listed above ruined  
18 Democracy for every one of them by manipulating the government for their personal profits at the  
19 expense of every taxpayer!

20 Victim: " ...Without breaking a single law, we are hunting down and destroying every single  
21 one of the scumbags who attacked us and destroyed Democracy for their own power mongering, sex  
22 cult-driven, sick profiteering schemes...These crooks need to know, with certainty: if the FBI doesn't  
23 get you - we and the crowd-sourced public forensics groups will!..."

24 Join the "FOLLOW-THE-MONEY" Team and learn 100% legal CIA and FBI-class tactics  
25 and technologies which are being used to track why these people are all connected by covert  
26 financial and asset tracks. Extensive case files and dossiers on each party, below, are available in  
27 torrents globally. These people knowingly engaged in these crimes, attacks and illicit activities! \*\*  
28 = The worst ones. They share a cadre of dirty CPA, legal and lobbyist firms that assist them with

1 their dirty work and run the interface between Fusion GPS, Black Cube, Media Matters, Gizmodo  
2 and other hit-job services.

3  
4 Follow-the-money, the surveillance data, the stock market accounts, the sex workers and the emails!  
5 These people don't do "good deeds" or help their nation. They do dirty schemes to help themselves  
6 make money off of citizens and destroy their competitors because they would rather cheat than  
7 compete!

8  
9 This is who financed and operated the attacks. They operate illicit manipulations and anti-trust  
10 violations. Free-roaming automatic AI bots are out working around-the-clock scanning every  
11 database to connect their bribes, payola, stealth funds, tax evasions, money-laundering, sex  
12 trafficking and other illicit deeds. These are the ones that everyone is working on exposing, indicting  
13 and TAKING DOWN!

14  
15 **Court Statement By One Of Many Victims:**

16 *"... Plaintiffs were attacked with a \$30 million dollar+*  
17 *retribution/political-reprisal/revenge hatchet-job program contracted by White House and*  
18 *Department of Energy political operatives, their appointees and staffing. Plaintiffs have sourced*  
19 *the payment records evidence to prove it. Those public officials illegally used taxpayer-financed*  
20 *government funds and they were also business competitors of my peers and I. They are mad*  
21 *because they got caught doing crimes with taxpayer funds...There is, now, no legal or historical-*  
22 *fact question about the veracity of the proof that public officials put "hit-jobs" on reporters,*  
23 *whistle-blowers or competitors using government resources to do so. In fact, today, the U.S.*  
24 *Congress is spending nearly a third of it's time on the question of agencies being used as reprisal*  
25 *operations....famous senators, their Silicon Valley oligarch financiers and their associates run a*  
26 *felony-class organized crime insider-trading scam that abuses taxpayers and sabotages*  
27 *competing businesses at the expense of the public treasuries.*  
28 *This is about a group of U.S. Senators, Silicon Valley Oligarchs, Detroit Oligarchs, Crooked Law*

*Firms and Lobbyists who commit crimes in order to manipulate over a trillion tax dollars into their, and their friends pockets. They use media monopoly tricks to try to shut out any other viewpoints. They push manufactured "emotional trigger" issues that they believe will get more tax money allocated to "issue solutions" that they, and their friends, happen to already own the monopolies for. They are felons yet they control some of the offices of the agencies who are supposed to arrest them. Silicon Valley bought K Street lobby firms and U.S. Senators, gave them more 'Dark Money' than history has ever seen and then had giant tech-law firms bribe, hit-job and blockade any attempts to arrest them...The U.S. Government hired us, paid us part of Plaintiffs money, then asked us to spend Plaintiffs life savings and years of Plaintiffs time on THEIR federal project based on their lies and false-promises. Then they took the assets we were asked to invest, plus the money they owed us, and gave it to their friends. When we complained to the FBI, Congress and the SEC, they hired Fusion GPS-like companies to run "hit-jobs" on us and threaten Plaintiffs lives.*

*WE WERE LIED TO AND DEFRAUDED BY GOVERNMENT AGENCIES. THEY TOOK Plaintiffs MONEY AND USED US, AND Plaintiffs PEERS, AS A SMOKE-SCREEN TO HIDE THEIR CRONY PAYOLA CRIME THAT PUT taxpayer CASH IN THEIR FRIEND'S POCKETS...Plaintiffs have received ZERO justice and ZERO compensation for Plaintiffs damages, Plaintiffs time, Plaintiffs witness testimony and Plaintiffs help provided to the authorities! Plaintiffs demand Plaintiffs compensation from the State And Federal authorities! Neither I, Plaintiffs peers or the voters will ever let this go until we receive justice!..."*

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### **Key points of note in this RICO racketeering case:**

- These [Jeffrey Epstein-LIKE](https://www.netflix.com/title/80224905) ( <https://www.netflix.com/title/80224905> ) crooks include senators, technology ceo's and famous sand hill road venture capitalists. those suspects have engaged in the largest sets of bribes in u.s. history! don't let these silicon valley sex-trafficking, bribing, racist, misogynist, tax-evading, money-laundering, black-listing, felony criminals get away

1 with it!

2 - The [Flynn Case](https://www.trunews.com/article/former-intel-chiefs-flynn-destroyed-by-cia-nsa-hit-job) ( [https://www.trunews.com/article/former-intel-chiefs-flynn-destroyed-](https://www.trunews.com/article/former-intel-chiefs-flynn-destroyed-by-cia-nsa-hit-job)  
3 [by-cia-nsa-hit-job](https://www.trunews.com/article/former-intel-chiefs-flynn-destroyed-by-cia-nsa-hit-job) ), The [Strzok Case](https://www.washingtonexaminer.com/news/peter-strzoks-wife-discovered-lisa-page-affair-on-his-phone-doj-reveals) ( [https://www.washingtonexaminer.com/news/peter-strzoks-](https://www.washingtonexaminer.com/news/peter-strzoks-wife-discovered-lisa-page-affair-on-his-phone-doj-reveals)  
4 [wife-discovered-lisa-page-affair-on-his-phone-doj-reveals](https://www.washingtonexaminer.com/news/peter-strzoks-wife-discovered-lisa-page-affair-on-his-phone-doj-reveals) ), The [Solyndra Case](https://www.judicialwatch.org/corruption-chronicles/fed-audit-confirms-govt-corruption-in-solyndra-deal/) ( [https://www.judicialwatch.org/corruption-chronicles/fed-audit-confirms-govt-corruption-in-](https://www.judicialwatch.org/corruption-chronicles/fed-audit-confirms-govt-corruption-in-solyndra-deal/)  
5 [solyndra-deal/](https://www.judicialwatch.org/corruption-chronicles/fed-audit-confirms-govt-corruption-in-solyndra-deal/) ), The [GOOGLE Corruption Cases](https://www.wsj.com/articles/justice-department-state-attorneys-general-likely-to-bring-antitrust-lawsuits-against-google-11589573622), ( [https://www.wsj.com/articles/justice-](https://www.wsj.com/articles/justice-department-state-attorneys-general-likely-to-bring-antitrust-lawsuits-against-google-11589573622)  
6 [department-state-attorneys-general-likely-to-bring-antitrust-lawsuits-against-google-11589573622](https://www.wsj.com/articles/justice-department-state-attorneys-general-likely-to-bring-antitrust-lawsuits-against-google-11589573622) )  
7 The 200+ [Silicon Valley Cases](https://www.technewsworld.com/story/85141.html) ( <https://www.technewsworld.com/story/85141.html> ) and MORE,  
8 prove that [White House](https://www.allsides.com/news/2020-05-14-0636/obamagate-isn-t-conspiracy-theory-it-s-biggest-political-scandal-Plaintiffs-time-and) ( [https://www.allsides.com/news/2020-05-14-0636/obamagate-isn-t-](https://www.allsides.com/news/2020-05-14-0636/obamagate-isn-t-conspiracy-theory-it-s-biggest-political-scandal-Plaintiffs-time-and)  
9 [conspiracy-theory-it-s-biggest-political-scandal-Plaintiffs-time-and](https://www.allsides.com/news/2020-05-14-0636/obamagate-isn-t-conspiracy-theory-it-s-biggest-political-scandal-Plaintiffs-time-and) ) officials weaponized federal  
10 intelligence and services staff and used federal agencies to put hit-jobs on citizens, as anti-trust  
11 violating reprisal/revenge vendettas, on orders from their [Silicon Valley](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation) ( [https://en.wikipedia.org/wiki/High-Tech\\_Employee\\_Antitrust\\_Litigation](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation) ) campaign financiers.  
12 Billionaires and their companies like Tesla, Google, Facebook, Solyndra, Netflix, etc., got kick-  
13 backs, government contracts, monopolies and tax evasion perks for their quid-pro-quo! In the  
14 current and previous "emergency stimulus bills", under the guise of "it's an emergency, give us all  
15 the money", Congressional leaders took taxpayer funds and put the money and stock market perks  
16 in their family bank accounts, while sabotaging their business competitors. The Congressional  
17 hearings have proven it!

18 - "Plaintiffs witnessed a series of [felony corruption crimes](http://american-corruption.com/AAFINAL-GOVT-Loan-Guarantees-Report%20-%20THE%20CLEANTECH%20CRASH%20ENERGY%20DEPT%20SLUSH%20FUND.pdf) ( [http://american-](http://american-corruption.com/AAFINAL-GOVT-Loan-Guarantees-Report%20-%20THE%20CLEANTECH%20CRASH%20ENERGY%20DEPT%20SLUSH%20FUND.pdf)  
19 [corruption.com/AAFINAL-GOVT-Loan-Guarantees-Report%20-%20THE%20CLEANTECH](http://american-corruption.com/AAFINAL-GOVT-Loan-Guarantees-Report%20-%20THE%20CLEANTECH%20CRASH%20ENERGY%20DEPT%20SLUSH%20FUND.pdf)  
20 [%20CRASH%20ENERGY%20DEPT%20SLUSH%20FUND.pdf](http://american-corruption.com/AAFINAL-GOVT-Loan-Guarantees-Report%20-%20THE%20CLEANTECH%20CRASH%20ENERGY%20DEPT%20SLUSH%20FUND.pdf) ) , mind numbing cronyism, and  
21 [political payola using insider trading](http://american-corruption.com/GOOGLE_FEDERAL_COMPLAINT_NOTES_2020.html) ( [http://american-](http://american-corruption.com/GOOGLE_FEDERAL_COMPLAINT_NOTES_2020.html)  
22 [corruption.com/GOOGLE\\_FEDERAL\\_COMPLAINT\\_NOTES\\_2020.html](http://american-corruption.com/GOOGLE_FEDERAL_COMPLAINT_NOTES_2020.html) ) and  
23 we reported those crimes. In exchange we got [hit-jobs](https://gawker-media-attacks.weebly.com/) ( <https://gawker-media-attacks.weebly.com/>  
24 <https://gawker-media-attacks.weebly.com/> ) , cover-ups, de-funding, rights-blockades, harassment and ZERO JUSTICE from public officials!"

25 - [News reports](https://thenationalpulse.com/politics/biden-black-lives-matter-defund-the-police/) ( [https://thenationalpulse.com/politics/biden-black-lives-matter-defund-the-](https://thenationalpulse.com/politics/biden-black-lives-matter-defund-the-police/)  
26 [police/](https://thenationalpulse.com/politics/biden-black-lives-matter-defund-the-police/) ) have now [revealed](https://theconservativetreehouse.com/2020/06/11/exploited-again-) ( <https://theconservativetreehouse.com/2020/06/11/exploited-again->

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1 financial-contributions-to-black-lives-matter-are-being-funneled-to-biden-campaign/?  
 2 utm\_source=whatfinger ) that the Silicon Valley oligarchs are [funding and creating](#) (  
 3 [https://www.investmentwatchblog.com/here-is-the-employee-chart-for-actblue-charities-the-](https://www.investmentwatchblog.com/here-is-the-employee-chart-for-actblue-charities-the-company-that-receives-every-dollar-raised-via-the-black-lives-matter-website/?utm_source=whatfinger)  
 4 [company-that-receives-every-dollar-raised-via-the-black-lives-matter-website/?](https://www.investmentwatchblog.com/here-is-the-employee-chart-for-actblue-charities-the-company-that-receives-every-dollar-raised-via-the-black-lives-matter-website/?utm_source=whatfinger)  
 5 utm\_source=whatfinger ) the BLM riots and street ruckus in order to get even more political  
 6 donations for election manipulations. These are the same Stanford elitists that ran the Cleantech  
 7 Crash scam. They don't care about the environment, racism or anything but their stock market  
 8 accounts. They only care about killing off their competitors and they use "green-washing" to cover  
 9 their crimes. You can find a list of their names at the bottom of this document. They have thousands  
 10 of operatives like Steve Spinner, David Plouffe, Sid Blumenthal, Nick Denton, etc. that launder  
 11 hundreds of millions of dollars through a vast number of PAC's and fake 'charities'. This mob had  
 12 the idea to: "control all information and manipulate politics for the benefit of their bank accounts"  
 13 - Public forensic investigations are [bringing hell](#) ( [http://american-corruption.com/HOW](http://american-corruption.com/HOW%20TO%20DESTROY%20ANY%20CORRUPT%20COMPANY%20OR%20PERSON%20ON%20EARTH%20WITH%20TOTALLY%20LEGAL%20TACTICS.pdf)  
 14 [%20TO%20DESTROY%20ANY%20CORRUPT%20COMPANY%20OR%20PERSON%20ON](http://american-corruption.com/HOW%20TO%20DESTROY%20ANY%20CORRUPT%20COMPANY%20OR%20PERSON%20ON%20EARTH%20WITH%20TOTALLY%20LEGAL%20TACTICS.pdf)  
 15 [%20EARTH%20WITH%20TOTALLY%20LEGAL%20TACTICS.pdf](http://american-corruption.com/HOW%20TO%20DESTROY%20ANY%20CORRUPT%20COMPANY%20OR%20PERSON%20ON%20EARTH%20WITH%20TOTALLY%20LEGAL%20TACTICS.pdf) ) to every big tech crook  
 16 involved in this scheme, for the rest of their lives, until they are brought to justice. These crooks are  
 17 now [under surveillance](#) (  
 18 [http://american-corruption.com/EXPOSING\\_CORRUPT\\_OLIGARCHS.html](http://american-corruption.com/EXPOSING_CORRUPT_OLIGARCHS.html) ) and [investigation](#)  
 19 ( <https://www.centreforpublicimpact.org/case-study/fbi-virtual-case-file-system/> ) by the public,  
 20 and they are being exposed, doxed, reported and FBI-charged. [Disclosure dossiers](#) (  
 21 <https://legalbeagle.com/8546756-write-official-case-file.html> ) have been [produced on every single](#)  
 22 [one of the top 200 culprits!](#) ( [http://american-corruption.com/expose\\_THE\\_MOBSTERS.html](http://american-corruption.com/expose_THE_MOBSTERS.html) )  
 23 Global citizen social media and news [out-reach programs](#) (  
 24 [http://american-corruption.com/ANTI\\_CORRUPTION\\_BATTLE\\_ON\\_BEHALF\\_OF\\_AMERICA](http://american-corruption.com/ANTI_CORRUPTION_BATTLE_ON_BEHALF_OF_AMERICAN_CITIZENS.html)  
 25 [N\\_CITIZENS.html](http://american-corruption.com/ANTI_CORRUPTION_BATTLE_ON_BEHALF_OF_AMERICAN_CITIZENS.html) ) contact hundreds of thousands of voters per day. By the time the next  
 26 elections get here, [EVERYBODY](#) (  
 27 [http://american-corruption.com/EXPOSING\\_CORRUPT\\_OLIGARCHS.html](http://american-corruption.com/EXPOSING_CORRUPT_OLIGARCHS.html) ) will know about  
 28 this corruption and [EACH](#) (

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1 [http://american-corruption.com/EXPOSING\\_CORRUPT\\_OLIGARCHS.html](http://american-corruption.com/EXPOSING_CORRUPT_OLIGARCHS.html) ) of the perpetrators  
 2 by name! If you have a computer YOU have the tools to investigate them just like the FBI does.

3 - Plaintiffs [saw criminal actions including bribes, insider trading, etc.](#), that Plaintiffs  
 4 politicians engaged in, and got no help, no responses and no provision of Plaintiffs Constitutional  
 5 rights so we are forced to rely on citizen crowd-sourcing of investigations and mass social media  
 6 out-reach for justice! ( [https://finance.townhall.com/columnists/maritanoon/2012/11/25/exclusive-](https://finance.townhall.com/columnists/maritanoon/2012/11/25/exclusive-GOVT-corruptionappointed-and-elected-officials-should-face-prison-time-n851724)  
 7 [GOVT-corruptionappointed-and-elected-officials-should-face-prison-time-n851724](https://finance.townhall.com/columnists/maritanoon/2012/11/25/exclusive-GOVT-corruptionappointed-and-elected-officials-should-face-prison-time-n851724) )

8 - The 2008 Department of Energy [Cleantech Crash](#) proves that a federal agency was used as  
 9 just one big slush-fund to pay-off political campaign financiers, operate insider-trading stocks and  
 10 sabotage those financiers competitors using taxpayer-financed resources! Plaintiffs have used  
 11 private investigator, FBI resources and deep AI research to [reveal that all government staff working](#)  
 12 [on Plaintiffs application were getting quid-pro-quo...they were on the take.](#) (Can anyone point out to  
 13 us EVEN ONE person who was in the GOVT/White House loop who was not working for, invested  
 14 in, getting a future job from or other wise conflicted?) What do you do when The U.S. Government  
 15 convinces you to invest millions of dollars, and your life, into one of their projects. Then their  
 16 project turns out to be a scam where they had covertly hard-wired the upside to a couple of  
 17 Senator's and their campaign financier friends. The fix was in and the game was rigged to use a  
 18 government program as a slush-fund for friends-with-benefits. Plaintiffs, and the public, got  
 19 defrauded. Now the damages must be paid for, one way, or another. Every one of the insiders who  
 20 did get government funding got it in the exact same size and order as their covert political campaign  
 21 funding and stock market bribes to the deciders. Chamath Palihapitiya and other Silicon Valley  
 22 insiders have now exposed the fact that Greylock, Kleiner, etc. are just a [VC Ponzi Scheme! in this](#)  
 23 [whole mess.](#)

24 ( <https://www.cbsnews.com/news/cleantech-crash-60-minutes/> )

25 ( [http://american-corruption.com/expose THE MOBSTERS.html](http://american-corruption.com/expose_THE_MOBSTERS.html) )

26 ( <https://www.youtube.com/watch?v=NVVsdIHslfi> )

27  
 28 - Elon Musk got government money by bribing public officials and stacking hundreds of his

1 friends and shareholders, ie: Steven Chu, Matt Rogers, Steve Westly, Steve Spinner's 'special  
2 friend', investor Google's employees, etc. on the staff of The U.S. Government and in the White  
3 House. In other words, hundreds of Elon Musk's friends and financiers from Silicon Valley (Mostly  
4 from his investor: Google) were placed in the very offices that decided if he got the government  
5 funds. Plaintiffs have FBI-class records, financial tracking, emails, stock market relay records and  
6 other forensic data that proves it. Plaintiffs can swear, warrant, certify and prove these assertions in  
7 front of Congress in a live Congressional hearing or Civil Jury trial, given non-compromised legal  
8 backing. Musk bribed Senators, bought a President and had his buddies take over most of the  
9 Department of Energy. [Lithium metals](#), ( <https://lithium-ion.weebly.com/> ) and other rare earth  
10 mining materials, are monopolized by Elon Musk and his Silicon Valley Cartel, in rare-earth  
11 corrupt mining scams. Lithium's widespread [use in cars is hindered](#) ( <https://www.hackernoon.com/dangers-li-ion-batteries-might-aware-4960f2f75ae7> ) by a  
12 challenging obstacle: upon multiple charge-discharge cycles, [fractal filaments called dendrites](#) ( <https://www.pressconnects.com/story/news/2020/01/21/lithium-batteries-everywhere-dangerous-what-know-rochester-binghamton/4480496002/> ) always grow through the electrolyte from the  
13 negative to the positive electrode and [short-circuit the battery](#) ( [https://batteryuniversity.com/learn/article/safety\\_concerns\\_with\\_li\\_ion](https://batteryuniversity.com/learn/article/safety_concerns_with_li_ion) ) from the inside, thus  
14 guaranteeing that [Tesla Cars](#) ( <https://www.livescience.com/62179-tesla-fire-cleanup-danger.html> )  
15 will [eventually all explode](#) ( <https://www.wired.com/2017/03/dont-blame-batteries-every-lithium-ion-explosion/> ) . [Musk and Panasonic have known](#) this since 2007 (They are "dumping" the  
16 batteries via Tesla) and have paid U.S. Senators, who own stock in Tesla, [to cover it up](#). [The lithium fires and toxic vapors are a major safety concern because they have killed, poisoned and injured too many citizens](#). Musk gets away with his scams because he pays U.S. Senators bribes with stocks in  
17 his corporations and has a thousand crooked Goldman Sachs investment bankers selling his hair-  
18 brained schemes to your parents pension funds. Musk's partners created the government policy to  
19 sell pretend air, known as carbon credits. He makes \$200M per year selling this pretend air. It is like  
20 you getting paid to sell your farts based on the hope that you might eat some beans some day.  
21 Musk's big bucks don't come from selling cars but from government mooch schemes.



( <https://www.nbcnews.com/health/health-news/battery-behind-dangerous-deadly-e-cigarette-explosions-n1032901> )

( <https://eandt.theiet.org/content/articles/2016/10/lithium-ion-batteries-found-to-produce-toxic-gases/> )

( <https://www.visiontimes.com/2019/02/15/dangers-of-lithium-ion-batteries.html> )

- Plaintiffs have formally asked the FBI and DOJ to investigate, engage in surveillance upon and interview attackers: Nicholas Guido Denton, John Hermann, Ian Fette, Adrian Covert, Patrick George, John Cook, Larry Page, Eric Schmidt, David Drummond, David Axelrod, David Plouffe, Lachlan Seward, Jay Carney, Robert Gibbs and their associates and determine how they were compensated for the attacks, who had command and control of their actions and who acted as a conduit for the funds. These people bribed government officials, sold Plaintiffs government and Democratic process like they were running a garage sale and used taxpayer-funded resources to attack anyone who reported the crimes involving their Tech Cartel! Their emails, text messages, stock market accounts, bank accounts, paypal accounts and social accounts prove what they were up to!

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### **A Previous Sent Letter To William Barr, Attorney General For The United States Of America Via Certified Mail And Email:**

*“...Plaintiffs filed a federal Tort Claim ‘Form 95’ for damages and were informed by federal insiders that the claim was being stone-walled. Plaintiffs need to take deeper legal action against the government entities that caused the damages. Those damages are metricized in the seven to nine figures and proven by forensic data.*

*Plaintiffs, and Plaintiffs peers, have filed claims and reports with every law enforcement and regulatory entity we know of and testified for a number of them. My co-investors filed lawsuits and won in federal court on the proof that a government entity engaged in favoritism and quid-pro-quo but I have yet to receive any damages cash as I was an interested party in those other cases. My*



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1 lawyer now works for you so he is conflicted out from helping us on this case any further.

2 After completing a federal contract, to perfection, to build America's next generation energy  
3 and transportation technologies, Plaintiffs team were promised a factory contract, and funding, to  
4 deliver these low-cost, hyper-efficient, job-building, clean solutions to every American.

5 It turns out, we were lied to and defrauded. My associates found out that crooked politicians  
6 had secretly arranged to give Plaintiffs money and contracts to their best friends. That is a felony  
7 crime that abuses quite a few State and federal RICO, Anti-Trust laws, Quid-Pro-Quo laws, the  
8 public and the roots of Democracy..

9 Plaintiffs found out, thanks to FBI, OSC, GAO, OMB and private investigators, that the  
10 jurisdictional Senators and related politicians were engaged in corruption in partnership with a  
11 specific group of Silicon Valley tech oligarchs, now under investigation by various agencies of The  
12 U.S. Government .

13 Investigators have not found a single political entity in this case who was not either:  
14 financed by, friends with, sleeping with, dating the staff of, holding stock market assets in, promised  
15 a revolving door job or government service contracts from, partying with, personal friends with,  
16 photographed at private events with, making profits by consulting for, exchanging emails with,  
17 business associates of or directed by; one of those business adversaries, or the Senators and  
18 politicians that those business adversaries pay campaign finances to, or supply political search  
19 engine manipulation services to.

20 In other words, the FBI found that the politicians that were supposed to represent and  
21 protect us were the owners, financiers and beneficiaries of Plaintiffs local and national competitors.  
22 Plaintiffs would be delighted to sit down with you at Plaintiffs regional FBI office to go over the  
23 connections and crimes with you and the senior FBI staff again.

24 Plaintiffs were lied to by government representatives who said we could make "hundreds of  
25 millions of dollars in sales profits and carbon credits sales" if we invested millions of dollars of  
26 Plaintiffs resources and years of Plaintiffs lives in America. Plaintiffs were induced to invest.  
27 Plaintiffs invested, but those representatives secretly knew they had already hard-wired the funds to  
28 Plaintiffs competitors. Plaintiffs competitors made hundreds of millions of dollars at Plaintiffs

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1 expense!

2 Those "representatives" were Senators and government agency bosses who were financed  
3 by, friends with, sleeping with, dating the staff of, holding stock market assets in, promised a  
4 revolving door job or government service contracts from, partying with, personal friends with,  
5 photographed at private events with, making profits by consulting for, exchanging emails with,  
6 business associates of or directed by; one of those business adversaries, or the Senators and  
7 politicians that those business adversaries pay campaign finances to, or supply political search  
8 engine manipulation services to.

9 Plaintiffs product and services metrics beat those of every other competitor. Plaintiffs won  
10 on every comparison item except we refused to pay the bribes and cooperate with the illegal quid-  
11 pro-quo demands.

12 Plaintiffs found that mega-insider law firms operate a cartel of political appointee  
13 placements via quid-pro-quo deals, black-lists and manipulation of public policy and policy  
14 decisions via covert perks and payola schemes.

15 Plaintiffs found out how insider stock trading between politicians and tech companies is the  
16 largest form of corruption in America.

17 Plaintiffs found out who the top 200 dirty politicians, corrupt investment bankers and tech  
18 oligarchs were that operated the scheme. Plaintiffs found out thanks to some FBI, GAO,  
19 Congressional and Media investigators. The evidence and financial tracking software proves it. The  
20 quid-pro-quo tracks back to each and every one of their stock market, i-bank and estate accounts.

21 Plaintiffs aresues are headline news every day. Nobody can doubt the veracity of Plaintiffs  
22 claims since they read about the exact same things in the news every morning.

23 How might you help me, personally, recover my monies for the damages from fraud,  
24 interference and other losses?..."

25 -----  
26  
27

28 Plaintiffs have asked the FBI, OSC, SEC and FTC to investigate the fact that the executives

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1 and investors of Google, YouTube, Facebook, Tesla, Netflix, LinkedIn, and their owned politicians,  
 2 run an organized criminal stock market and public policy manipulation racketeering cartel.

3 These tech oligarchs have been documented meeting and conspiring to harm others, that  
 4 they compete with, using mobster-type tactics and methods. That is a FELONY violation of federal  
 5 RICO laws.

6 Plaintiffs elected officials owned portions of these companies, were financed by these  
 7 companies, allowed these companies to write laws they presented to Congress, slept with the staff  
 8 of these companies, exchanged staff with these companies, had media manipulated on their behalf  
 9 by these companies and engaged in other illicit deeds with these companies

10 -----

11  
 12  
 13 **Per The United States Congress, The FBI and the FTC: The Previous High-Tech**  
 14 **Antitrust Black-Listing Litigation** is a [United States Department of Justice](#) (DOJ) [antitrust](#) action  
 15 and a civil [class action](#) against several [Silicon Valley](#) companies for secret collusion agreements  
 16 which targeted high-tech employees. This case was one of the most famous federal lawsuits in  
 17 Silicon Valley. [Scam fronts for Silicon Valley oligarchs are being exposed daily.](#)

18 ( [https://en.wikipedia.org/wiki/United\\_States\\_Department\\_of\\_Justice](https://en.wikipedia.org/wiki/United_States_Department_of_Justice) )  
 19 ( <https://en.wikipedia.org/wiki/Antitrust> )  
 20 ( [https://en.wikipedia.org/wiki/Class\\_action](https://en.wikipedia.org/wiki/Class_action) )  
 21 ( [https://en.wikipedia.org/wiki/Silicon\\_Valley](https://en.wikipedia.org/wiki/Silicon_Valley) )  
 22 ( [https://www.politico.com/news/2020/05/05/americans-progressive-action-super-pac-fake-](https://www.politico.com/news/2020/05/05/americans-progressive-action-super-pac-fake-234316)  
 23 [234316](#) )

24  
 25 **The [tech Cartel is evil](#) because:**

26 **they steal any technology they desire;**

27 ( <https://thebaffler.com/latest/mouthbreathing-machiavellis> )  
 28

1       they run a **prostitution ring** and **sexually extort young women and interns** in Silicon  
2 Valley;

3       ( [https://www.vanityfair.com/news/2018/01/brotopia-silicon-valley-secretive-orgiastic-](https://www.vanityfair.com/news/2018/01/brotopia-silicon-valley-secretive-orgiastic-inner-sanctum)  
4 [inner-sanctum](https://www.vanityfair.com/news/2018/01/brotopia-silicon-valley-secretive-orgiastic-inner-sanctum) )

5       ( [https://www.mercurynews.com/2017/07/09/silicon-valley-reeling-wake-sexual-](https://www.mercurynews.com/2017/07/09/silicon-valley-reeling-wake-sexual-harassment-storm/)  
6 [harassment-storm/](https://www.mercurynews.com/2017/07/09/silicon-valley-reeling-wake-sexual-harassment-storm/) )

7  
8       they are 'rape culture' **take-what-they-want misogynists**;

9       ( <https://www.nytimes.com/2017/07/03/technology/silicon-valley-sexual-harassment.html> )

10       ageists and **racists** as their history of abuses has proven;

11       ( <https://www.digitaltrends.com/mobile/google-gender-and-ethnic-demographics-statistics/> )

12  
13       their Palo Alto Cartel operates **AngelGate-type collusion** and **stock market insider**  
14 **trading schemes that harm independent business and the public**;

15       ( <https://en.wikipedia.org/wiki/Angelgate> )

16       ( [http://american-corruption.com/Pelosi\\_Clan\\_Owned\\_By\\_China.html](http://american-corruption.com/Pelosi_Clan_Owned_By_China.html) )

17  
18       their Cartel ran the "no poaching" CEO ring which was class-action sued by DOJ and  
19 tech workers; 90% of their divorce court files **reveal horrific abuses** and **sex trafficking**;

20       ( [https://www.theguardian.com/technology/2016/aug/12/gurbaksh-chahal-silicon-valley-](https://www.theguardian.com/technology/2016/aug/12/gurbaksh-chahal-silicon-valley-domestic-assault-sentence)  
21 [domestic-assault-sentence](https://www.theguardian.com/technology/2016/aug/12/gurbaksh-chahal-silicon-valley-domestic-assault-sentence) )

22       ( [https://www.news.com.au/finance/tech-titan-michael-goguen-of-sequioa-capital-kept-](https://www.news.com.au/finance/tech-titan-michael-goguen-of-sequioa-capital-kept-amber-baptiste-as-a-sex-slave-for-13-years/news-story/91012180fc3b23d50c1e6be8105c92e7)  
23 [amber-baptiste-as-a-sex-slave-for-13-years/news-story/91012180fc3b23d50c1e6be8105c92e7](https://www.news.com.au/finance/tech-titan-michael-goguen-of-sequioa-capital-kept-amber-baptiste-as-a-sex-slave-for-13-years/news-story/91012180fc3b23d50c1e6be8105c92e7) )

24       They have an **army of lobbyists** that pay cash, stock market and **revolving door bribes**  
25 to U.S. Senators;

26       ( [https://www.theguardian.com/technology/2017/sep/03/silicon-valley-politics-lobbying-](https://www.theguardian.com/technology/2017/sep/03/silicon-valley-politics-lobbying-washington)  
27 [washington](https://www.theguardian.com/technology/2017/sep/03/silicon-valley-politics-lobbying-washington) )

28       ( <https://globalanticorruptionblog.com/2014/10/28/corruption-and-the-revolving-door->

1 [recent-discussions-and-further-reflections/](#) )

2  
3 They can even evade FBI & SEC investigations; They hire women to act as '[trophy](#)  
4 [wives](#)' and '[beards](#)';

5 ( [https://www.forbes.com/2008/07/11/billionaire-wives-club-biz-billies-](https://www.forbes.com/2008/07/11/billionaire-wives-club-biz-billies-cx_cv_0711billiewives_slide.html)  
6 [cx\\_cv\\_0711billiewives\\_slide.html](https://www.forbes.com/2008/07/11/billionaire-wives-club-biz-billies-cx_cv_0711billiewives_slide.html) )

7 ( [https://www.axios.com/silicon-valley-sex-party-was-at-steve-jurvetsons-home-](https://www.axios.com/silicon-valley-sex-party-was-at-steve-jurvetsons-home-1515699374-132b7731-3e58-4727-bc6a-48e5c234a3e5.html)  
8 [1515699374-132b7731-3e58-4727-bc6a-48e5c234a3e5.html](https://www.axios.com/silicon-valley-sex-party-was-at-steve-jurvetsons-home-1515699374-132b7731-3e58-4727-bc6a-48e5c234a3e5.html) )

9 they have [lobbyists rig the U.S. Patent Office](#) in order to block inventor patent rights  
10 because they are using stolen technologies;

11 ( <https://www.usinventor.org/> )

12 they have been caught on video and recordings beating, [kicking and harming women](#)  
13 [hundreds of times](#);

14 ( [https://www.theguardian.com/technology/2016/aug/12/gurbaksh-chahal-silicon-valley-](https://www.theguardian.com/technology/2016/aug/12/gurbaksh-chahal-silicon-valley-domestic-assault-sentence)  
15 [domestic-assault-sentence](https://www.theguardian.com/technology/2016/aug/12/gurbaksh-chahal-silicon-valley-domestic-assault-sentence) )

16 They have bought up all of the Tier-One tech law firms and order them to [black-list](#),  
17 and never help, those who seek equal tech rights;

18 ( [https://www.nolo.com/legal-encyclopedia/free-books/employee-rights-book/chapter10-](https://www.nolo.com/legal-encyclopedia/free-books/employee-rights-book/chapter10-9.html)  
19 [9.html](https://www.nolo.com/legal-encyclopedia/free-books/employee-rights-book/chapter10-9.html) )

20 they collude to abuse your privacy and make databases on the public for political  
21 control; they have to cheat to compete because they are only good with spread sheets instead  
22 of innovation; They run black-lists, character assassination attacks, collusion and other anti-  
23 trust violating acts in violation of RICO laws.

24 Silicon Valley has become the largest assemblage of douche-bags and yuppie frat boy  
25 [criminals](#) in human history.

26 ( <https://www.jobsforfelonshub.com/locations/jobs-for-felons-in-palo-alto-california/> )

27 [Theranos](#) is not the exception, it is the standard. [Tesla](#), Google, Theranos,

28 Plaintiffswork, Facebook are lies backed by famous political insiders to protect [their insider](#)

1 **trading** and covered-up by fake news operators. They are also fronts to fund political  
2 campaigns via the ill-gotten profits from their endeavors.

3 ( [http://american-corruption.com/department\\_of\\_energy\\_financing.html](http://american-corruption.com/department_of_energy_financing.html) )

4 ( <https://senatestockwatcher.com/> )

5 When the bad guys, and their lap-dog politicians, attack you because your products are  
6 better than theirs they are proving that they are **frat boy scumbags**, from Stanford and Yale,  
7 that operate in a little pack, like dogs! Their Sandhill Road operation should be raided by the  
8 FBI! The best thing that could come from the COVID pandemic is that they all are forced into  
9 bankruptcy!

10 ( [https://www.nationalreview.com/2016/06/stanford-rape-case-hook-culture-root-campus-](https://www.nationalreview.com/2016/06/stanford-rape-case-hook-culture-root-campus-sexual-assault-problem/)  
11 [sexual-assault-problem/](https://www.nationalreview.com/2016/06/stanford-rape-case-hook-culture-root-campus-sexual-assault-problem/) )

12 When your **Senator holds stock market shares** in companies that exist to **profit on the**  
13 **backs of consumers**, via corruption, then it is impossible for that Senator to ever do anything  
14 but be corrupt!

15 ( <https://www.cbsnews.com/news/congress-trading-stock-on-inside-information/> )

16 ( [https://www.tampabay.com/florida-politics/buzz/2020/04/22/donna-shalala-lone-democrat-](https://www.tampabay.com/florida-politics/buzz/2020/04/22/donna-shalala-lone-democrat-overseeing-500b-virus-fund-failed-to-disclose-2019-stock-sales/)  
17 [overseeing-500b-virus-fund-failed-to-disclose-2019-stock-sales/](https://www.tampabay.com/florida-politics/buzz/2020/04/22/donna-shalala-lone-democrat-overseeing-500b-virus-fund-failed-to-disclose-2019-stock-sales/) )

18  
19 Plaintiffs have reported this in writing to winklerm@sec.gov, sanfrancisco@sec.gov  
20 and 30+ other federal officers but have yet to see Plaintiffs whistle-blower rewards...or any  
21 action! Do you wonder how big politician insider stock trading is? Take a look at how many  
22 TRILLIONS of dollars pass through the stock markets annually and then look at the  
23 reported, AND UNREPORTED, securities holdings of famous U.S. Senators and government  
24 agency staff. That is what Seth Rich and the people in the "*In Memory Of*" section, below,  
25 were disclosing. **These are massive crimes!**

26 ( [http://american-corruption.com/ANTI\\_CORRUPTION\\_BATTLE\\_ON\\_BEHALF\\_OF\\_AMERICA](http://american-corruption.com/ANTI_CORRUPTION_BATTLE_ON_BEHALF_OF_AMERICAN_CITIZENS.html)  
27 [N\\_CITIZENS.html](http://american-corruption.com/ANTI_CORRUPTION_BATTLE_ON_BEHALF_OF_AMERICAN_CITIZENS.html) )  
28

1  
2 The crooks at Google, Facebook, Tesla, Linkedin, Netflix, etc., broke felony laws and the  
3 [basic principles of Democracy.](#)

4 ( <https://www.cbsnews.com/news/congress-trading-stock-on-inside-information/> )

5  
6 [GOOGLE, \*\*Especially\*\*, must be exterminated and every executive and investor exposed and](#)  
7 [prosecuted because of these crimes:](#)

8 ( <https://www.cbsnews.com/news/congress-trading-stock-on-inside-information/> )

9 -  
10 [Google faces \\$5 billion lawsuit in U.S. for tracking 'private' internet use. Google WILL pay](#)  
11 [for their crimes and must be extinguished as a business because of their corruption!](#)

12 ( [https://www.reuters.com/article/us-alphabet-google-privacy-lawsuit/google-faces-5-](https://www.reuters.com/article/us-alphabet-google-privacy-lawsuit/google-faces-5-billion-lawsuit-in-u-s-for-tracking-private-internet-use-idUSKBN23933H)  
13 [billion-lawsuit-in-u-s-for-tracking-private-internet-use-idUSKBN23933H](https://www.reuters.com/article/us-alphabet-google-privacy-lawsuit/google-faces-5-billion-lawsuit-in-u-s-for-tracking-private-internet-use-idUSKBN23933H) )

14 They bribed your Senators, White House Staff, insider agency staff and operated a Silicon  
15 Valley Oligarch sociopath political Cartel.

16 What kinds of people were some of these high tech oligarchs? Read their divorce Court  
17 Records about their Jeffrey **Epstein**, [NXIVM](#) sex trafficking; Andy Rubin and Goguen [sex slaves](#);  
18 tax evasions; money laundering; intern abuses; misogyny; racism; political insider-trading stock  
19 market bribes to U.S. Senators; a '[Silicon Valley Tech Mafia](#)' and other horrors.

20 ( [https://www.thecut.com/2019/05/the-most-disturbing-details-from-the-nxivm-sex-cult-](https://www.thecut.com/2019/05/the-most-disturbing-details-from-the-nxivm-sex-cult-case.html)  
21 [case.html](https://www.thecut.com/2019/05/the-most-disturbing-details-from-the-nxivm-sex-cult-case.html) )

22 ( [http://american-corruption.com/departement\\_of\\_energy\\_financing.html](http://american-corruption.com/departement_of_energy_financing.html) )

23  
24 What would you do if you found out that Eric Schmidt, Larry Page, Elon Musk, Sergy Brin,  
25 John Doerr and other dynastic elitist insider Stanford frat boys were running a mob-like Cartel?  
26 Over 60,000 engineers in Silicon Valley took the problem to Federal Court!

27 The defendants, in the first case, included [Adobe](#), [Apple Inc.](#), [Google](#), [Intel](#), [Intuit](#), [Pixar](#),  
28 [Lucasfilm](#) and [eBay](#), all high-technology companies with a principal place of business in the San

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1 Francisco–Silicon Valley area of California where they collude together to harm competitors. It is a  
2 well documented fact that Facebook, Google, Netflix, LinkedIn, etc. use sophisticated psychological  
3 testing on each applicant in order to filter out all but the most radical devotees of the founders  
4 ideologies. These companies then maintain an echo-chamber resonance, throughout the company, to  
5 reinforce their ideological message, much like Scientology does. In these companies one must  
6 praise Elon Musk and Mark Zuckerberg and hate those who the founders target. The founders target  
7 their competitors, in violation of anti-trust laws.

8 The first civil class action was filed by five Plaintiffs, one of whom has died in a curious  
9 incident; it accused the tech companies of collusion between 2005 and 2009. In Abolish Silicon  
10 Valley: How to liberate technology from capitalism we see another of thousands of insiders expose  
11 the fact that Silicon Valley is a pile of filth.

12 ( [https://www.penguinrandomhouse.com/books/622177/abolish-silicon-valley-by-wendy-](https://www.penguinrandomhouse.com/books/622177/abolish-silicon-valley-by-wendy-liu/)  
13 [liu/](https://www.penguinrandomhouse.com/books/622177/abolish-silicon-valley-by-wendy-liu/) )

14 Additional cases are planned for filing. Formal complaints have been filed with The SEC,  
15 The DOJ, The GAO, The FBI, The FTC and The U.S. Congress. Active investigations into  
16 'Angelgate' and related collusion and anti-trust matters are known to be under-way by federal, news  
17 outlet and private investigators as of 2020.

18 ( <https://en.wikipedia.org/wiki/Angelgate> )  
19

20 U.S. Senators, and other politicians, who covertly own stock in these Silicon Valley  
21 companies, have been delaying enforcement against these corrupt companies. Consumer rights  
22 groups have pledged to take down each and every politician who owns these corrupt stocks and  
23 protects these corrupt companies!

24 Plaintiffs alliance of the public, journalists, investigators and agency staff have FBI-level  
25 investigated: Steven Chu, Larry Page, David Dummond, Lachlan Seward, Andy Rubin, Jeffrey  
26 Epstein, Elon Musk, Nicholas Guido Denton, Harvey Weinstein, Eric Schmidt and the rest of the  
27 RICO-violating "Club" and had them fired or removed from their positions. They will remain under  
28 public surveillance for the rest of their lives and their case files will be added to monthly via



submissions to federal agencies and news entities.

**What would an insane tech oligarch (Like Schmidt, Musk, Reid, Brin, Westly, Page, Khosla, etc.) do for trillions of dollars of criminal gain and control of politics and ideology?**

When you run the following query on the stock market volume for a single day, ie: *"Select sum(Close\*volume\*0.001), count(\*) from myTable where date = '9/27/2017'."*..you get the following result: 7300 stocks were traded, Total Money flow: \$271,072,334,824. This is how much was traded on that day.

The total world derivatives market has been estimated at about \$791 trillion face or nominal value, 11 times the size of the entire world economy.

The World Bank publishes global data on stocks traded by \$ value [here](#). ie:

- 2016 - \$77.5 trillion for the year.
- ( <https://data.worldbank.org/indicator/CM.MKT.TRAD.CD?end=2016&start=1975&view=chart> )

Most exchanges publish this stat. [Here](#) is the data for NASDAQ

- Feb 6, 2018 - \$192 billion for the day.
- ( <http://www.nasdaqtrader.com/Trader.aspx?id=DailyMarketSummary> )

And the Indian stock market volume data (in Indian Rupees) is [here](#).

- BSE + NSE cash market, Feb 2018 - About Rs 40,000 crore daily. That's about \$6 billion per day.
- ( <http://www.moneycontrol.com/stocks/marketstats/turnover/> )

Average estimates put daily stock movement between 5 to ten trillion dollars per day. You can buy lot's of Weinstein/Epstein-like private islands, private jets, sex parties, U.S. Senators and crony government contracts with that kind of money. Once an oligarch starts buying sex with underage girls, they don't stop. [In fact, there is nothing that a corrupt tech oligarch and their owned Senator won't do to keep their little pig trough filled up.](#)

- ( [http://american-corruption.com/EXPOSE\\_THE\\_MOBSTERS.html](http://american-corruption.com/EXPOSE_THE_MOBSTERS.html) )

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1 The average murder/robbery in the United States is undertaken for an average amount under  
2 \$100.00

3 Thus, an Eric Schmidt, Elon Musk, Steve Westly, David Drummond, Vinod Khosla, Reid  
4 Hoffman, Steve Jurvetson, Andy Rubin, Larry Page or similar oligarch, who is sociologically  
5 addicted to money and power, is most certainly capable of ordering and operating election  
6 manipulations, Presidential bribes, murders and engaging in other crimes to protect those greed-  
7 based assets. They have the full resources to do so, have federal records proving that they hire  
8 lobbyists and operatives who do these things for them and have a documented history of engaging  
9 in extremist actions.

10 (   
11 [http://american-corruption.com/How Google And Facebook Put Obama In The White House.h](http://american-corruption.com/How_Google_And_Facebook_Put_Obama_In_The_White_House.html)  
12 [tml](http://american-corruption.com/How_Google_And_Facebook_Put_Obama_In_The_White_House.html) )

13  
14 **The Silicon Valley Cartel Hires Gawker, Gizmodo, Jalopnik,**  
15 **Black Cube, Fusion GPS, etc. to run "hit-jobs" on those who report their crimes!**  
16  
17  
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**EXHIBIT 35 - The Hit Job Operators The White House Hired**

How much do you have to pay Google, Alphabet, YouTube and Black Cube to dedicate a portion of their servers to push a character assassination set of links, against a competitor, to all five billion people on Earth with internet access? How much did Obama, Clinton, Bloomberg spend using those exact same systems to attack their political enemies? How much does it cost to order a citizen's social security benefits blockaded, have their phones and computers hacked and run a global character assassination media campaign to defame and black-list them? Every one of the attack technologies and resources were previously deployed against Presidential candidates in past elections. The providers, operators and compensation conduits of the attack services are known to law enforcement. The payment records have been uncovered, revealing that over \$30M of billings were incurred. By way of contrast: \$30M is the typical WEEKLY expenditure for opposition character assassination programs in a U.S. Presidential election using Gawker, Gizmodo, Facebook, Google and Fusion GPS media attack services. ([See the detailed investigation report on the specific attacks](http://www.majestic111.com/)) ( <http://www.majestic111.com/> )

Plaintiffs know. Plaintiffs have their financial records, invoices and receipts and so does the FBI and the NSA.

How much do you have to pay to get them to lock those attack links on one of the first 4 lines of EVERY search result, in the same position in the search results, for over a decade (which proves that their search results are not "organic", they are manually manipulated by Google and YouTube)? How much did Obama, Clinton, Bloomberg spend using those exact same systems to attack their political enemies?

Plaintiffs know. Plaintiffs have their financial records, invoices and receipts and so does the FBI and the NSA.

How much does it cost to make a Disney-like animated movie about a whistle-blower? How much does the production and software and person-hour billings cost? How much does it cost to distribute that movie world-wide and lock it in the top line of all search results?

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1 Plaintiffs know. Plaintiffs have their financial records, invoices and receipts and so does the  
2 FBI and the NSA.

3 How much does it cost to hire a warehouse full of Russian, Nigerian and Chinese click-farm  
4 operators who use Palantir and Google software to instantly be alerted of any mention of a person's  
5 name on the internet and to then go slam that person in the comment sections with endless troll  
6 remarks? Elon Musk uses these same people to hype his narcissistic need for attention. Obama,  
7 Clinton, Bloomberg and other politicians hire these same people to attack their political adversaries.  
8 How much does it cost to have anonymous trolls in foreign countries kill a person's brand globally?

9 Plaintiffs know. Plaintiffs have their financial records, invoices and receipts and a huge  
10 number of lawsuits, court records, federal investigation and investigative journalism reports have  
11 exposed those records and details. The FBI, NSA, SEC, FTC and Congressional investigators can  
12 also confirm these numbers!

13 So it turns out that it costs: **\$35,422,152.00 to have a person and their business killed!**

14 That is how much they spent on their attack on the Plaintiffs! The people at the top of the  
15 heap who organized the attacks were David Plouffe, Jay Carney, David Axelrod, Denis  
16 McDonough, Steve Rattner, Robert Gibbs, Rahm Emanuel and their associates and they did it from  
17 **The West Wing and The Oval Office in The White House.**

18 Many of the political attacks were edited by [Nick Denton](#) and his seedy tabloid empire  
19 Gawker/Gizmodo.

20 ( [https://www.takimag.com/article/gawker\\_media\\_hypocrites\\_vs\\_douchecanoes/](https://www.takimag.com/article/gawker_media_hypocrites_vs_douchecanoes/) )

21 Media Matters for America founder David Brock is a hired media assassin who reaped  
22 illegal profits through the transfer of millions from a nonprofit he founded to a for-profit entity  
23 under his control, according to an IRS complaint filed by a watchdog group. The [complaint](#) details  
24 how Brock's nonprofit group American Bridge Foundation (AB Foundation) transferred \$2.7  
25 million in tax-exempt assets to True Blue Media, a for-profit company owned by Brock that is the  
26 parent company of ShareBlue, a for-profit media company now known as [The American](#)  
27 [Independent](#).

28 ( <https://cdn01.dailycaller.com/wp-content/uploads/2020/04/AB-Foundation->

1 [Complaint.pdf](#) )

2 ( <https://americanindependent.com/> )

3 The transfers violated IRS rules that prohibit nonprofit organizations from using their tax-  
4 exempt resources to pay personal or private expenses of any key figures connected to the nonprofit,  
5 the complaint stated. AB Foundation's transfers to True Blue Media were disclosed in the  
6 nonprofit's Form 990s filed to the IRS in [2017](#) and [2018](#). *"Brock is a well-known hit man who took*  
7 *money to target Plaintiffs group in reprisal for whistle-blowing...."* Said Team 7 staff.

8 The money was conduited and assisted for pass-through by political financiers Eric Schmidt,  
9 Larry Page, Sergy Brin, Elon Musk, John Doerr, Vinod Khosla, Steve Westly, Steve Spinner and  
10 their [Silicon Valley oligarch Cartel](#) black-listing operation.

11 ( [http://american-corruption.com/departments\\_of\\_energy\\_financing.html](http://american-corruption.com/departments_of_energy_financing.html) )

12 It was a felony. It violated RICO, Anti-Trust and Constitutional laws.

13 So they spent over thirty five million dollars attacking the Plaintiffs and shutting down a  
14 competitor that was targeted to make over six billion dollars in profits. The attackers then made the  
15 six billion dollars in profits for themselves, at the expense of the Plaintiffs.

16 So how much do you think they owe the Plaintiffs per previous court awards for such crimes  
17 against a member of the public?

18 [Silicon Valley's No-poaching Case: The Growing Debate over ...](#)

19 ☐ [https://knowledge.wharton.upenn.edu/article/silicon-valleys-poaching-case-growing-](https://knowledge.wharton.upenn.edu/article/silicon-valleys-poaching-case-growing-debate-employee-mobility/)  
20 [debate-employee-mobility/](https://knowledge.wharton.upenn.edu/article/silicon-valleys-poaching-case-growing-debate-employee-mobility/)

21 "Silicon Valley's No-poaching Case: The Growing Debate over Employee Mobility."  
22 Knowledge@Wharton. The Wharton School, University of Pennsylvania, 30 April, 2014.

23 [Steve Jobs was 'central figure' in Silicon Valley's 'no ...](#)

24 ☐ <https://money.cnn.com/2014/08/11/technology/silicon-valley-poaching-case/index.html>

25 Aug 11, 2014A **lawsuit** by **Silicon Valley** workers claims Steve Jobs was a ringleader in a  
26 conspiracy not to poach employees. If **Silicon Valley's** biggest companies want an embarrassing  
27 employee **lawsuit** to go ...  
28

### EXHIBIT 36 - The Politician-Based Sex Cult Club These Perpetrators Use

The perpetrators operate a **massive and abusive national sex cult**. [The perverts](#) in the SandHill Road Venture Capital offices, located between Highway 280 down to Santa Cruz Avenue on Sand Hill Road in Menlo Park, California, are the main perpetrators of this global cartel.

( <https://www.vanityfair.com/news/2018/01/brotopia-silicon-valley-secretive-orgiastic-inner-sanctum> )

Their executives at Google, Facebook, Netflix, Linkedin, Twitter, and their related holdings, comprise the rest. The Harvey Weinstein and [Ed Buck](#) sex scandals are well known.

( <https://ktla.com/2019/09/17/dem-donor-ed-buck-arrested-after-3rd-mans-overdose-charged-with-operating-west-hollywood-drug-house/> )

These [sex cult actions](#) have been widely covered in the news individually, ie:

- The [Joe Lonsdale rape case](#)

( <https://europetodaynews.wordpress.com/2017/04/28/joe-lonsdale-rapist-abusive-frat-boy-and-mysoginst-or-gods-gift-to-women/> )

- The [Kleiner Perkins Ellen Pao sex abuse lawsuit](#)

( <https://www.eandblaw.com/employment-discrimination-blog/2016/02/19/pao-v-kleiner-perkins/> )

- The [Eric Schmidt sex penthouse stories](#)

( <https://www.dailymail.co.uk/news/article-2377785/Google-CEO-serial-womanizer-Eric-Schmidt-spends-15-million-dollars-private-doorman-Manhattan-penthouse-totally-soundproofed.html> )

1  
2 - **The Jeffrey Epstein case**

3 ( <https://www.miamiherald.com/news/local/article220097825.html> )

4  
5 - **The Google Forrest Hayes hooker murder case**

6 ( <https://www.usatoday.com/story/tech/2014/07/09/google-exec-hayes-killed-by-call-girl/12422797/> )

7  
8  
9 - **The Google Andy Rubin sex slave case**

10 ( <https://conservativedailypost.com/android-co-founder-accused-of-running-sex-slave-ring/> )

11  
12 - **The Sergy Brin 3-way sex romp scandal**

13 ( <https://nexter.org/google-sex-scandal-sergey-brin-playboy-book-alleges> )

14  
15 - **The Steve Bing Case**

16 ( <https://newspunch.com/steve-bing-clinton-friend-associate-epstein-links-dead/> )

17  
18 - **The Hydrant investigation**

19 ( [https://en.wikipedia.org/wiki/Operation\\_Hydrant](https://en.wikipedia.org/wiki/Operation_Hydrant) )

20  
21 - **The Elon Musk Steve Jurvetson billionaire sex parties scandals**

22 ( <https://pagesix.com/2018/02/12/elon-musk-sported-interesting-getup-at-alleged-sex-party/> )

23  
24  
25 - **The NXIVM sexual slave cases**

26 ( <https://www.oxygen.com/crime-time/nxivm-sex-slave-details-horrific-allegations-against-keith-raniere> )

1       - **The Michael Goguen anal sex slave case**

2       ( [https://www.news.com.au/finance/tech-titan-michael-goguen-of-sequioa-capital-kept-](https://www.news.com.au/finance/tech-titan-michael-goguen-of-sequioa-capital-kept-amber-baptiste-as-a-sex-slave-for-13-years/news-story/91012180fc3b23d50c1e6be8105c92e7)  
3 [amber-baptiste-as-a-sex-slave-for-13-years/news-story/91012180fc3b23d50c1e6be8105c92e7](https://www.news.com.au/finance/tech-titan-michael-goguen-of-sequioa-capital-kept-amber-baptiste-as-a-sex-slave-for-13-years/news-story/91012180fc3b23d50c1e6be8105c92e7) )

4  
5       - **The Tom Perkins Hooker Parties**

6       ( <https://fortune.com/2018/01/02/brotopia-book-silicon-valley-sex-party/> )

7  
8       **and thousands of other cases and federal divorce court filings.**

9       ( <https://www.pacer.gov/> )

10  
11       This group of people have proven themselves, over and over, to be sociopath control freaks  
12 not fit for participation in public commerce, public policy or media control.

13       ( [https://www.npr.org/sections/alltechconsidered/2017/09/19/551810814/silicon-valley-s-](https://www.npr.org/sections/alltechconsidered/2017/09/19/551810814/silicon-valley-s-ellen-pao-tackles-sex-discrimination-workplace-diversity-in-mem)  
14 [ellen-pao-tackles-sex-discrimination-workplace-diversity-in-mem](https://www.npr.org/sections/alltechconsidered/2017/09/19/551810814/silicon-valley-s-ellen-pao-tackles-sex-discrimination-workplace-diversity-in-mem) )

15       ( [https://nypost.com/2018/01/03/book-details-tech-bros-drug-fueled-sex-parties-in-silicon-](https://nypost.com/2018/01/03/book-details-tech-bros-drug-fueled-sex-parties-in-silicon-valley/)  
16 [valley/](https://nypost.com/2018/01/03/book-details-tech-bros-drug-fueled-sex-parties-in-silicon-valley/) )

17  
18       The Four Seasons Hotel and Rosewood Hotels in Silicon Valley are estimated to engage in  
19 over \$30,000.00 of high-end escort sex trafficking per day, a portion of it managed by Eastern Bloc  
20 Mafia operators.

21       ( [https://www.thedailybeast.com/silicon-valleys-sex-workers-are-being-priced-out-of-the-](https://www.thedailybeast.com/silicon-valleys-sex-workers-are-being-priced-out-of-the-city-by-their-own-clients)  
22 [city-by-their-own-clients](https://www.thedailybeast.com/silicon-valleys-sex-workers-are-being-priced-out-of-the-city-by-their-own-clients) )

23       ( <https://escortontop.com/hotel-escorts.htm> )

24       ( <https://www.vanityfair.com/culture/2013/05/silicon-valley-cougar-nights-love> )

25       ( [https://www.quora.com/Do-escorts-really-use-the-Rosewood-Hotel-lobby-bar-in-Menlo-](https://www.quora.com/Do-escorts-really-use-the-Rosewood-Hotel-lobby-bar-in-Menlo-Park)  
26 [Park](https://www.quora.com/Do-escorts-really-use-the-Rosewood-Hotel-lobby-bar-in-Menlo-Park) )

27  
28       - **The Elon Musk sex perversions are the tip of the iceberg.**



( <https://www.dailymail.co.uk/news/article-8426719/Cara-Delevingne-three-way-affair-Amber-Heard-Elon-Musk.html> )

At least 10 Ukrainian escorts fly in and out of SFO and SJO airports every week for these Cartel members. Google boss David Drummond engaged in horrible philandering sexual violations of his wife yet Google covers up every story about it on the web. [Google's Eric Schmidt is under massive investigation.](#)

( [http://american-corruption.com/Eric\\_Schmidt\\_Has\\_A\\_Psychotic\\_Need\\_To\\_Control\\_Governments\\_And\\_Society.html](http://american-corruption.com/Eric_Schmidt_Has_A_Psychotic_Need_To_Control_Governments_And_Society.html) )

You hear about the female victims of this sex cult but you rarely hear about the young male victims. One of their vast numbers of prostitutes is quoted as saying that the girls and boys are paid "not just for sex but for the oligarch's endless need to feel that they can control anyone for any reason...". Multiple attorney general's controlled by their cartel, ie: [Eric Schneiderman](#) and [Eliot Spitzer](#) , are involved this these sex rings.

( <https://newspunch.com/eric-schneiderman-nxivm-child-sex-slaves-clintons/> )

( [https://en.wikipedia.org/wiki/Eliot\\_Spitzer](https://en.wikipedia.org/wiki/Eliot_Spitzer) )

*These are the main influencers of a national political party and they are all involved in horrific sex perversions and abuses! The associates political figures financed by this sex Cartel include: Illinois State Representative, **Keith Farnham**, who has resigned and was charged with possession of child pornography and has been accused of bragging at an online site about sexually molesting a 6-year-old girl; Spokesperson for the Arkansas Democratic Party, **Harold Moody, Jr**, who was charged with distribution and possession of child pornography; Radnor Township Board of Commissioners member, **Philip Ahr**, who resigned from his position after being charged with possession of child pornography and abusing children between 2 and 6 years-old; Activist and BLM organizer, **Charles Wade**, who was arrested and charged with human trafficking and underage prostitution; Texas attorney and activist, **Mark Benavides**, who was charged with having sex with a*

1 minor, inducing a child under 18 to have sex and compelling prostitution of at least nine legal  
2 clients and possession of child pornography, he was found guilty on six counts of sex trafficking;  
3 Virginia Delegate, **Joe Morrissey**, who was indicted on charges connected to his relationship with a  
4 17-year-old girl and was charged with supervisory indecent liberties with a minor, electronic  
5 solicitation of a minor, possession of child pornography and distribution of child pornography;  
6 Massachusetts Congressman, **Gerry Studds**, who was censured by the House of Representatives  
7 after he admitted to an inappropriate relationship with a 17-year-old page; Former Mayor of  
8 Stillwater, New York, **Rick Nelson** who was plead guilty to five counts of possession of child  
9 pornography of children less than 16 years of age; Mayor of Clayton, New York, **Dale Kenyon**, who  
10 was indicted for sexual acts against a teenager; Former Mayor of Hubbard, Ohio, **Richard**  
11 **Keenan**, who was given a life sentence in jail for raping a 4-year-old girl; Former Mayor of  
12 Winston, Oregon, **Kenneth Barrett**, who was arrested for setting up a meeting to have sex with a  
13 14-year-old girl who turned out to be a police officer; The Mayor of Randolph, Nebraska, **Dwayne**  
14 **L. Schutt**, who was arrested and charged with four counts of felony third-degree sexual assault of a  
15 child and one count of intentional child abuse.

16  
17 The associates political figures financed by this sex Cartel also include: The Former Mayor of  
18 Dawson, Georgia, **Christopher Wright**, who was indicted on the charges of aggravated child  
19 molestation, aggravated sodomy, rape, child molestation and statutory rape of an 11-year-old boy  
20 and a 12-year-old girl; Former Mayor of Stockton, California, **Anthony Silva**, who was charged  
21 with providing alcohol to young adults during a game of strip poker that included a 16-year-old boy  
22 at a camp for underprivileged children run by the mayor; Former Mayor of Millbrook, New York,  
23 **Donald Briggs**, who was arrested and charged with inappropriate sexual contact with a person  
24 younger than 17; The party leader for Victoria County, Texas, **Stephen Jabbour**, who plead guilty  
25 to possession and receiving over half a million child pornographic images; DNC activist and  
26 fundraiser, **Terrence Bean**, who was arrested on charges of sodomy and sex abuse in a case  
27 involving a 15-year-old boy; DNC Party Chairman for Davidson County, Tennessee, **Rodney**  
28 **Mullin**, who resigned amid child pornography allegations; DNC activist, **Andrew Douglas Reed**,

1 who pleaded guilty to multiple counts of 2nd-degree sexual exploitation of a minor for producing  
2 child pornography; DNC official from Terre Haute, Indiana, **David Roberts** who was sentenced to  
3 federal prison for producing and possessing child pornography including placing hidden cameras  
4 in the bedrooms and bathrooms at a home he shared with two minor female victims; Democratic  
5 California Congressman, **Tony Cárdenas**, who is being sued in LA County for allegedly sexually  
6 abused a 16-year-old girl; Democratic aide to Senator **Barbara Boxer**, **Jeff Rosato**, who plead  
7 guilty to charges of trading in child pornography; Alaskan State Representative, **Dean Westlake**,  
8 who resigned from his seat after the media published a report alleging he fathered a child with a  
9 16-year-old girl when he was 28; New Jersey State Assemblyman, **Neil Cohen**, who was convicted  
10 of possession and distribution of child pornography; DNC donor and billionaire, **Jeffrey Epstein**,  
11 ran an underage child sex brothel for The Commission and was convicted of soliciting underage  
12 girls for prostitution; New York Congressman, **Anthony Weiner**, who plead guilty to transferring  
13 obscene material to a minor as part of a plea agreement for sexted and sending Twitter DMs to  
14 underage girls as young as 15; DNC donor, activist, and Hollywood producer **Harvey Weinstein** is  
15 being criminally prosecuted and civilly sued for years of sexual abuse (that was well known  
16 “secret” in Hollywood) including underage sexual activities with aspiring female actresses; DNC  
17 activist and #metoo proponent, **Asia Argento**, settled a lawsuit for sexual harassment stemming  
18 from sexual activities with an underage actor; Mayor of Racine, Wisconsin, **Gary Becker**, who was  
19 convicted of attempted child seduction, child pornography, and other child sex crimes; Democratic  
20 Seattle Mayor **Ed Murray** resigned after multiple accusations of child sexual abuse were levied  
21 against him including by family members; San Francisco Mayoral candidate **John Molinari** had  
22 his daughter removed from his home by San Francisco Police for his abuse of her according to  
23 SFPD reports; San Francisco Mayoral candidate **Roger Boas** was arrested for running an  
24 underage sex brothel which catered to San Francisco political elite; DNC activist and aid to NYC  
25 Mayor De Blasio, **Jacob Schwartz** was arrested on possession of 3,000+ child pornographic  
26 images; Democratic activist and actor, **Russell Simmons**, was sued based on an allegation of  
27 sexual assault where he coerced an underage model for sex; DNC Governor of Oregon, **Neil**  
28 **Goldschmidt**, after being caught by a newspaper, publicly admitted to having a past sexual

relationship with a 13-year-old girl after the statute of limitations on the rape charges had expired; Democratic Illinois Congressman, **Mel Reynolds** resigned from Congress after he was convicted of statutory rape of a 16-year-old campaign volunteer; Democratic New York Congressman, **Fred Richmond**, was arrested in Washington D.C. for soliciting sex from a 16-year-old boy; Democratic activist, donor, and director, **Roman Polanski**, fled the country after pleading guilty to statutory rape of a 13-year-old girl - Democrats and Hollywood actors still defend him to this day, including, **Whoopi Goldberg, Martin Scorsese, Woody Allen, David Lynch, Wim Wenders, Pedro Almodovar, Tilda Swinton and Monica Bellucci**; Democratic State Senator from Alaska, **George Jacko**, was found guilty of sexual harassment of an underage legislative page; Democratic State Representative candidate for Colorado, **Andrew Myers**, was convicted for possession of child pornography and enticing children; Illinois Congressman, **Gus Savage** was investigated by the Democrat-controlled House Committee on Ethics for attempting to rape an underage female Peace Corps volunteer in Zaire; Activist, donor, and spokesperson for Subway, **Jared Fogle**, was convicted of distribution and receipt of child pornography and traveling to engage in illicit sexual conduct with a minor; State Department official, **Carl Carey**, under **Hillary Clinton**'s state department, was arrested on ten counts of child porn possession; Maine Assistant Attorney General, **James Cameron**, was sentenced to just over 15 years in federal prison for seven counts of child porn possession, receipt and transmission; Leading DNC boss and financier **Ed Buck** was arrested for killing gay prostitutes and running a sex and drug ring. Wealthy businessman Ed Buck hobnobbed and financed elite Democrats such as Barack Obama, Hillary Clinton, and Gavin Newsom. Away from the glamour of the dinner parties and fundraisers, Buck had a dangerous dark side. It included preying on masked gay black men in sexual games and injecting them with fatal levels of GHB and methamphetamine. ; State Department official, **Daniel Rosen**, under **Hillary Clinton**'s state department, was arrested and charged with allegedly soliciting sex from a minor over the internet; State Department official, **James Cafferty**, pleaded guilty to one count of transportation of child pornography; Democratic radio host, **Bernie Ward**, plead guilty to one count of sending child pornography over the Internet; Democratic deputy attorney general from California, **Raymond Liddy**, was arrested for possession of child pornography. There are

1 ***THOUSANDS*** of other sex crime cases involving associates of the tech Cartel. All of these  
2 perpetrators had financing from and social and political direction from the Silicon Valley  
3 controlling perpetrators.

4 ***Typical tech billionaire kept spreadsheet of 5,000 women he had sex with***

5 - Almost every Silicon Valley, Sand Hill road venture capitalist has participated in this  
6 Epstein-like sex cult  
7 - We have been pushing these charges for over a decade but the law in Woodside protects these  
8 scumbags from arrest and investigation  
9 - Elon Musk, Larry Page, Eric Schmidt, John Doerr and the rest are GOING DOWN!  
10 - Over 15 female private investigators have been tracking the Silicon Valley Cartel for over 10  
11 years  
12 - He and other Silicon Valley billionaires charged with hiring hit men to kill competitors and  
13 whistle-blowers.

14 By

15 [Isabel Vincent](#)  
16

17 Whitefish, Mont., is known for fly fishing and hiking trails studded with yellow Aspen trees.  
18 But after Silicon Valley billionaire Michael Goguen took up residence in the Rocky Mountain town  
19 several years ago, he transformed it into his private fiefdom: a dark banana republic where he  
20 allegedly controls local law enforcement — and a “harem” of young women.

21 The bombshell allegations, which also include claims of Goguen ordering his security chief  
22 to kill detractors, are contained in a lengthy civil complaint recently filed in United States District  
23 Court for the District of Montana.

24 According to the court papers, Goguen, 57, employs hundreds of residents in companies he  
25 controls, and owns a series of luxury “safe houses” where he takes dozens of young women for sex.  
26 He has a spreadsheet documenting his sexual encounters with 5,000 women, and even outfitted a  
27 local bar he owns with a basement “boom boom” room, which features a stripper pole. The  
28 underground enclave is allegedly used “to maintain women for the purpose of committing illicit

1 sexual activity.”

2 Requests for comment from Goguen’s lawyer were not returned Friday.

3 The complaint, which seeks more than \$800 million in damages, was filed by four former  
4 employees who set up Goguen’s Amyntor Group LLC, a Whitefish-based security contractor that  
5 had clients around the world.

6 Now, Goguen is wrapped up in a mystery that just keeps getting messier, as person after  
7 person has apparently tried to take him down — only to end up taken down themselves.

8 Originally from Bedford, Mass., Goguen joined the venture investment firm Sequoia  
9 Capital, based in Menlo Park, Calif., in 1996. It was already known for taking smart early bets on  
10 companies, including Apple and Cisco, and would later generate big buzz — and money — for  
11 getting behind brands that would become enormous: Google, YouTube, PayPal and Instagram  
12 among them.

13 He had gotten a share of the Google deal and, as Bloomberg reported, “frequently appeared  
14 on the Forbes Midas List for his ability to find and fund winning technologies.”

15 But things came to a crashing halt in 2016 when his former mistress Amber Baptiste, an  
16 exotic dancer from Canada, [accused him](#) of “constant sexual abuse,” including “countless hours of  
17 forced sodomy,” court papers say. He also demanded that she refer to him as “king” and “emperor,”  
18 according to the filings. In 2012 Baptiste said, she underwent surgery for a ruptured anal canal after  
19 Goguen “forcibly sodomized her and left her bleeding and alone on the floor of a hotel room in a  
20 foreign country,” court papers claimed.

21 Goguen won a countersuit in the three-year legal battle, eventually securing a restraining  
22 order against Baptiste from filing any similar suits against him. But the allegations cost him his job  
23 at Sequoia Capital in Silicon Valley, where he had been a longtime partner.

24 At the time a Sequoia spokesman told TechCrunch that “while the firm understood ‘these  
25 allegations of serious improprieties’ to be ‘unproven and unrelated to Sequoia’ its management  
26 committee had nevertheless ‘decided that Mike’s departure was the appropriate course of action.’”

27 Despite the high-profile exit, Goguen is still worth more than \$5 billion, according to a  
28 source.

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1 Goguen, began spending more time in Whitefish, a town of just over 7,000 residents, where  
2 he built a sprawling 75,000-square-foot mansion with an additional 30,000-square-foot nuclear-  
3 grade bunker that can accommodate up to 25 people for a year. He lives with his fourth wife.

4 There, he runs several businesses, including Casey's Whitefish, a pub and restaurant, and  
5 Two Bear Capital, a firm that invests in "early stage companies with disruptive innovations,"  
6 including biotech and cybersecurity, according to his LinkedIn page. He also funds Two Bear Farm  
7 and is behind Two Bear Air Rescue Foundation, a non-profit that provides "world class aviation  
8 support" to law enforcement and others for search and rescue, free of charge.

9 He started Amyntor Group LLC, a private defense contractor that, at one point, was in line  
10 to create a private spy network for the Trump administration, according to [BuzzFeed](#). Negotiations  
11 were stalled because Goguen could not obtain a security clearance with the US government because  
12 of the allegations of sexual abuse, court papers allege.

13 Meanwhile, another ghost from his past was about to haunt him.

14 Bryan Nash was a former workout buddy from California, who had reluctantly accompanied  
15 Goguen to bars and strip clubs.

16 In 2019, federal authorities indicted Nash on 10 counts of stalking and extortion; according  
17 to the criminal complaint, Nash had threatened to reveal unspecified secrets unless Goguen paid  
18 him \$15 million, and also emailed members of Goguen's family. In May 2020, Nash pleaded guilty  
19 to blackmailing Goguen, and was later sentenced to five years of probation.

20 This is where Matthew Marshall comes in.

21 A former Marine and alleged CIA operative, he once headed up the Amyntor Group — and  
22 is now the lead Plaintiffs in the civil suit filed against Goguen in February and amended in  
23 September.

24 Although Marshall, now 51, had been recruited by Goguen in 2013 to set up the private  
25 security contracting business, he alleges in his lawsuit that he soon became a reluctant fixer for the  
26 billionaire, arranging the purchase of luxury homes and vehicles for members of his harem, and  
27 spying on and intimidating his enemies.

28 "Marshall was being asked to purchase, out of his personal accounts, vehicles, jewelry,



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1 earnest money deposits on properties, and to provide cash or other items for Goguen's mistresses, or  
2 as hush-money payoffs to Goguen's acquaintances and employees who had 'learned too much'  
3 about Goguen's sexual misconduct and crimes, and the Goguen Sexual Scheme," court papers  
4 allege.

5 Marshall also paid for luxury v up of Playboy Playmates who were on safari in Africa and  
6 lost their passports, court papers say.

7 Women who tried to complain to police about Goguen's alleged sexual assaults were met  
8 with unsympathetic law enforcement at the Flathead County Sheriff's Dept, some of whom were on  
9 Goguen's payroll, according to court papers — which also allege that Goguen had set up a  
10 mechanism to listen in on police communications.

11 When one of those women told a local police officer that Goguen had allegedly sexually  
12 assaulted her, Marshall urged the officer to go to the FBI. But the investigation was quashed after  
13 Goguen wined and dined the cop, promising him luxury elk hunts in his private jet, court papers  
14 say.

15 Tristan Scott/Flathead Beacon

16 In 2018, the woman identified in court papers as Pam Doe, told Whitefish police that  
17 Goguen had sexually assaulted her after giving her cocaine and alcohol.

18 "He had sex with her and then paid her \$1,200," court papers say. The investigation was  
19 handed to Detective Shane Erickson, who did not follow through, court papers say.

20 "Det. Erickson openly shared with Marshall the fact that he was spending time with Goguen,  
21 including having dinner at his house, spending time on Whitefish Lake, going on a coyote hunt,"  
22 court papers say. "Erickson also informed Marshall that Goguen had offered to take him on his  
23 yearly week-long \$20,000 elk hunt in Colorado with private guides."

24 Pam Doe later recanted her story with police after signing a non-disparagement agreement  
25 with Goguen. It is not known if the agreement included a financial settlement.

26 "After witnessing their relationship over several years, Marshall came to understand that  
27 Goguen had placed Kim Doe and her children in a position of utter dependence based  
28 on false promises and emotional manipulation to satisfy his sexual appetite,"

*Excerpt from the court papers*



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1 In another instance, Marshall was dispatched to help a married woman, identified in court  
2 papers as Kim Doe. The wife of a prominent Whitefish businessman, she allegedly had a long-term  
3 affair with Goguen. When her husband found out about the trysts and began divorce proceedings,  
4 Goguen gave her a credit card and bought her a five-bedroom home in a nearby town. He told  
5 Marshall to pay the charges, which amounted to \$30,000 a month.

6 “After witnessing their relationship over several years, Marshall came to understand that  
7 Goguen had placed Kim Doe and her children in a position of utter dependence based on false  
8 promises and emotional manipulation to satisfy his sexual appetite,” court papers say.

9 Goguen’s old accusers also pop up in the new suit.

10 According to the court papers, Goguen once brought his daughters and their teenage  
11 babysitter to Nash’s home, where he allegedly had sex with the babysitter in a cottage on the  
12 property, according to court filings. An outraged Nash called him a pedophile and reported him to  
13 local police “to no avail,” court papers say.

14 The papers also claim Goguen had sex with Nash’s wife as they were going through a  
15 divorce. Goguen allegedly had Nash followed by a private detective and paid for the wife’s legal  
16 expenses, “causing the divorce to be drawn out and having Nash incur more expenses,” court papers  
17 say.

18 On Sept. 19, 2014, Goguen allegedly asked Marshall to arrange to kill Nash in a text  
19 message on wickr, an encrypted instant messaging platform: “He needs to be killed. I know that’s a  
20 VERY big ask but we are in defcon 5. We can discuss details in person but we do NOT have  
21 conversations about this on our cell phones. Wickr only...”

22 Marshall has claimed that he refused and tried to “dissuade Goguen from going to extreme  
23 measures against his enemies.”

24 As for Baptiste, the former mistress, in the lead up to her 2016 suit against him, Goguen  
25 allegedly asked Marshall to help with “cyber operations” and “immigration fraud,” urging him to  
26 find a way to deport Baptiste back to Canada. If he could have her deported “then his case with  
27 Baptiste would go away,” court papers said.

28 Once Baptiste’s lawsuit was filed, Goguen allegedly told Marshall to act as his “general

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1 100x more aggressive than Patton was, to coordinate and make sure everything is happening that  
2 should be happening — PR firms, private investigators criminal side, local PR, everything,”  
3 according to court papers. Goguen allegedly asked Marshall to hire a private investigator to follow  
4 Baptiste and use the resources of the security company to target her.

5 According to court papers, Marshall observed “the psychological pain and pressure” that  
6 Goguen “relentlessly applied” to Baptiste after she filed her California lawsuit for breach of a \$40  
7 million settlement.

8 But on Nov. 10, Marshall — like Nash and Baptiste before him — found himself suddenly  
9 in the hot seat.

10 He accepted [a plea agreement](#) in federal court in Montana for wire fraud, tax evasion and  
11 conning Goguen out of millions of dollars.

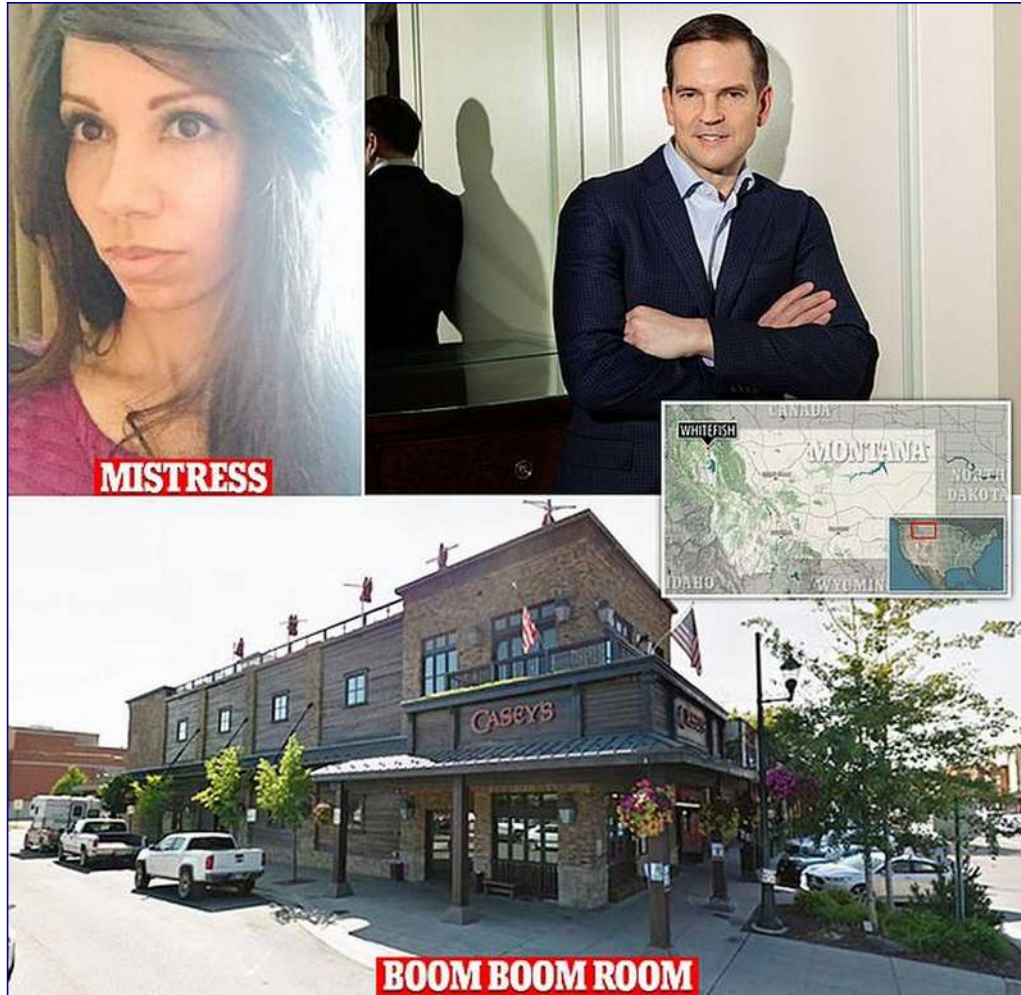
12 The federal charges against Marshall allegedly came after he began to complain about some  
13 of the extracurricular duties Goguen asked him to perform in order to keep his harem under control.

14 Marshall’s own civil suit states that Goguen and his associates filed false claims against the  
15 security expert, alleging that he committed fraud in order to hide Goguen’s underground sexual  
16 activities.

17 “Goguen ... falsely told the FBI that Marshall did not have the requisite experience, had  
18 stolen and then laundered funds from Goguen and testified in other ways meant to obstruct law  
19 enforcement’s discovery of Goguen’s sexual misconduct and the existence of the Goguen Sexual  
20 Scheme,” court papers allege.

21 Marshall pleaded guilty to wire fraud, money laundering and tax evasion. He said that he did  
22 not use money that Goguen had forwarded to him for paramilitary missions to Mexico “or anywhere  
23 else. Instead, he spent the money on personal expenses and loans and gifts to friends and family  
24 members, among other expenditures,” the plea states.

25 But according to the civil complaint, Marshall spent the cash on Goguen’s orders and was  
26 not reimbursed by Goguen.

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M

arshall agreed to pay up to \$3.5 million in restitution and is scheduled to be sentenced next year.

At least one local authority has had enough of Goguen.

“This man has to be stopped,” said Bill Dial. The retired Whitefish police chief sued Goguen in December 2019 for alleged interference in his own investigation. “He’s a billionaire a la Harvey Weinstein and Epstein. There’s a lot of people in this community who know what he’s about and they’re afraid of him.”

['A billionaire à la Epstein': Silicon Valley VC is sued by four employees who claim they helped him run a harem of women across the country out of rural Montana town and that he 'kept a spreadsheet of 5,000 women he slept with'](#)

A tech billionaire allegedly kept a spreadsheet of 5,000 women he's had sex with, one of them a teenager he paid off to keep quiet, despite losing his high-profile job over a sexual

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1 misconduct allegation in 2016. Michael Goguen, a former partner at Sequoia Capital who now  
2 heads his own firm, has been sued by four former employees who say they helped manage his  
3 'harem' of women. The explosive lawsuit claims the investor met the women at various safe houses  
4 or at a 'boom boom' room in the basement of a bar he owns in Whitefish, a small town in Montana  
5 where he now lives. The married billionaire, 57, asked his employees to arrange a hit on a former  
6 associate who knew too much about his life, according to the lawsuit. These are the latest  
7 allegations of sexual impropriety leveled against Goguen, who in 2016 was accused of 'countless  
8 hours of forced sodomy' by exotic dancer Amber Baptiste (inset). The latest 135-page lawsuit was  
9 filed in February by former employees of Goguen's Amyntor Group LLC, a security contractor,  
10 according to the New York Post. Among the Plaintiffs are Matthew Marshall, the former head of  
11 Amyntor who quickly grew to become Goguen's 'right-hand man.' Marshall pled guilty to wire  
12 fraud and other charges earlier this month after he pretended to be an elite member of the Marine  
13 Corps and asked Goguen for money for 'off the books' mission, according to the Flathead Beacon.  
14 Goguen, who is currently married to his fourth wife, allegedly kept a 'harem' of 'numerous women,  
15 including married women, strippers, and prostitutes,' whom he bought homes for and used for 'illicit  
16 sexual activity,' the suit claims. The investor, worth more than \$5 billion according to the New York  
17 Post, flew some of them in his private \$42 million jet. Goguen's former employees claim that  
18 Baptiste has Whitefish police in his pocket.

19 An inordinate number of the [members are closeted homosexuals](#) who seek to use their [media](#)  
20 [monopolies and massive lobbyist ownership's](#) to [promote child sex](#) and child sex change  
21 consideration.

22 ( <https://nationalnewsnetwork.net/video/the-silicon-valley-mafia-cartel> )

23 ( [https://en.wikipedia.org/wiki/PayPal\\_Mafia](https://en.wikipedia.org/wiki/PayPal_Mafia) )

24 ( [https://nypost.com/2016/10/09/the-sex-slave-scandal-that-exposed-pedophile-billionaire-](https://nypost.com/2016/10/09/the-sex-slave-scandal-that-exposed-pedophile-billionaire-jeffrey-epstein/)  
25 [jeffrey-epstein/](#) )

26  
27 Hence the [massive](#), sudden, [promotion of those issues](#) in all of [their media](#) since they took  
28 power in 2008 and pretty much ran the Obama White House.

( <https://www.nytimes.com/2014/07/20/fashion/silicon-valley-embrace-gay-and-lesbian-community.html> )

( <https://www.wired.com/2007/11/how-paypal-gave/> )

( <https://topica.asia/news/biggest-secret-of-silicon-valley-mafia-network/> )

The press has widely reported on underage boy sex clubs and the payment to parents for the blood of young boys by these oligarchs. A large number of tech VC's and senior executives are covert gay activists who hire women to act as their "beards".

( <https://www.forbes.com/sites/scottallison/2012/08/25/gay-in-silicon-valley-a-founders-perspective/> )

( <https://www.cnn.com/2017/05/31/blood-transfusions-from-teenagers-start-up-charging-8000-a-piece.html> )

( <http://www.abeldanger.org/web/wp-content/uploads/2017/05/The-Silicon-Valley-Mafia-Update-4.2-1.pdf> )

Their elitist Yale and Stanford fraternity house upbringings promoted "bromances", "rape culture" and a don't-worry-daddy-will-fix-it mentality. Highly gay law firms, (like Covington, Perkins and Sonsini), actively lobby to place gay politicians in office from their Bay Area offices.

( <http://politicalhat.com/2018/08/13/tech-overlords-of-silicon-valley-gay-frogs-and-the-silencing-of-dissent/> )

( [https://www.huffpost.com/entry/how-has-being-openly-gay\\_b\\_14367576](https://www.huffpost.com/entry/how-has-being-openly-gay_b_14367576) )

( [https://www.huffpost.com/entry/brock-turner-dad-letter-is-rape-culture-in-a-nutshell\\_n\\_57555bace4b0ed593f14cb30](https://www.huffpost.com/entry/brock-turner-dad-letter-is-rape-culture-in-a-nutshell_n_57555bace4b0ed593f14cb30) )

**What some of the fundraisers for the political candidates tell these oligarchs to get their cash:** *"...We need to control the government or you won't have enough money to buy private islands, ranches and penthouses and have young boys and girls flown in to have sex with. If we don't control the government, no more sex parties for you..."*

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The AngelGate Conspiracy ( <https://venturecapitalcorruption.weebly.com/the-angelgate-conspiracy.html> ); The Job Collusion Case ( [https://en.wikipedia.org/wiki/High-Tech\\_Employee\\_Antitrust\\_Litigation](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation) ) and hundreds of other cases, prove that the perpetrators regularly [meet](#), [conspire](#), [collude](#) and racketeer, in [full view](#) of law enforcement, without ever getting arrested by the FBI because they bribe public officials in order to avoid prosecution.

( <https://www.dailymail.co.uk/news/article-5229757/amp/Inside-Silicon-Valleys-sex-drug-parties.html> )

Public officials and Silicon Valley oligarchs exchanged felony bribes and manipulated government actions in order to benefit themselves and harm us. these are the facts including the lists of bribes, attacks and covert financing routes!

Famous members of congress lie, cheat, steal and manipulate public records in order to protect their trillions of dollars of Google, Facebook, Netflix, Tesla and Amazon insider stock market payola.

Now the public is working together, around the globe, to end this corruption forever by exposing every single one of the corrupt and all of their dirty secrets!

[Department of Energy staff \(ie: Chu\), White House staff \(ie: Emanuel\), CIA staff \(ie: Woolsey\) owned the rare earth \(ie: lithium, indium\) mining scam stock \(ie: Goldman Sachs transfers\) market securities from foreign countries \(ie: Afghanistan, Congo\) which only benefited themselves, Elon Musk and his Silicon Valley cartel.](#)

( [http://american-corruption.com/department\\_of\\_energy\\_financing.html](http://american-corruption.com/department_of_energy_financing.html) )

Demand the immediate divestiture of all stock market holdings of all politicians and their family members because that is how most bribes are now paid!

**The Political Corruption Crimes Plaintiffs experienced In California And Washington  
DC**

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1 The government is responsible to Plaintiffs for the damages to Plaintiffs.

2 As natural born citizens, they suffered injuries caused by the crimes of government staff  
3 during, and after, Plaintiffs work for the government.

4 The NY Times reported: "Ms. Feinstein and her husband sold \$1.5 million to \$6 million  
5 worth of stock in Allogene Therapeutics, a California-based biotech company, in transactions that  
6 took place on Jan. 31 and Feb. 18." S

7 ( [https://www.nytimes.com/2020/03/19/us/politics/richard-burr-stocks-sold-](https://www.nytimes.com/2020/03/19/us/politics/richard-burr-stocks-sold-coronavirus.html)  
8 [coronavirus.html](https://www.nytimes.com/2020/03/19/us/politics/richard-burr-stocks-sold-coronavirus.html) )

9 he, as usual, claimed that she has "no involvement in her husband's financial decisions" to  
10 avoid criticism. Do you really think that she has no idea about multi-million dollar deals that her  
11 husband is involved in? Dianne Feinstein, and her family owned the HR services, the construction  
12 company, the leasing services and the stock market accounts in Tesla and Solyndra and got the  
13 owners of those companies their government hand-outs. White House Staff and Department of  
14 Energy staff were fully aware of this and covered up these conflicts to protect their own stock  
15 holdings and revolving door jobs. She, and other Senators, ordered hit-jobs on the competitors to  
16 those companies, who were their constituents, in order to protect their stock holding profiteering  
17 efforts.

18

19 Public integrity at The U.S. Government and The U.S. Congress is in shambles because of this  
20 audacious corruption.

21

22

23

24

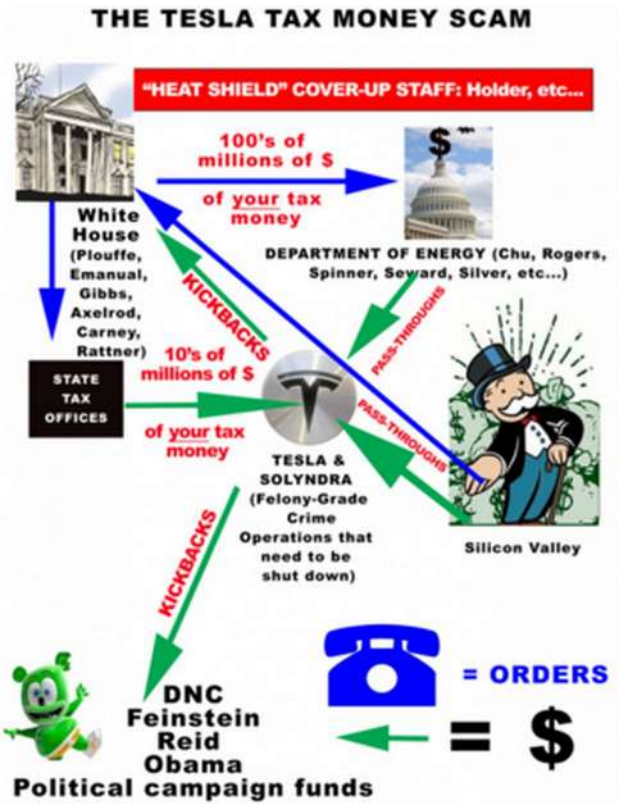
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26

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## **EXHIBIT 37 - The Crimes And Corruption That Plaintiffs Experienced**

These are just a few of the corrupt financial conflicts of interest we experienced while engaging in a federally contracted program:

- *Plaintiffs saw Congress not only fail to eliminate both the appearance and the potential for financial conflicts of interest; we saw Senators, White House staff and Department of Energy executives optimize the support structure to engage in such criminality. Americans must be confident that actions taken by public officials are intended to serve the public, and not those officials. The actions taken by Obama Administration staff and Department of Energy officials in illicit coordination with U.S. Senators were criminal acts in violation of RICO and other laws.*

- *Plaintiffs saw illicit individual stock ownership by Members of Congress, Cabinet Secretaries, senior congressional staff, federal judges, White House staff and other senior agency officials while in office. Those government officials acquired, held, 'pump-and-dumped' and traded stock where its value was influenced by their agency, department, or actions in efforts that harmed us.*

- *Plaintiffs saw government officials, including Plaintiffs U.S. Senators, engage in organized crime via insider trading, revolving door job payola, sex-for-perks trades, stock valuation fluffs, and more illicit actions.*

- *Plaintiffs saw conflict of interest laws and ethics violated by the President and Vice President in violation of Conflicts of Interest standards in which the President and the Vice President did not place conflicted assets, including businesses, into a blind trust to be sold off and hid conflicts of interest.*

- *Plaintiffs saw senior Department of Energy government officials, employees, contractors and White House staff invest in privately-owned assets that did present conflicts and harmed us, including large companies like Tesla, Google, Facebook, Sony, Netflix, etc., and commercial real estate.*

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( [http://american-corruption.com/departments\\_of\\_energy\\_financing.html](http://american-corruption.com/departments_of_energy_financing.html) )

- Plaintiffs saw an organized crime scheme to not respond to filings by citizens or reporters. Former White House and Energy Department staff use 'stone-walling' to intentionally delay responses for a decade, or more, and that tactic continues to this day.

- Plaintiffs saw ethics rules violations by government employees, including unpaid White House staff and advisers.

- Plaintiffs saw executive branch employees fail to recuse from all issues that might financially benefit themselves or a previous employer or client from the preceding 4 years in the "Cleantech" programs.

- Plaintiffs saw a 'Revolving Door' between Silicon Valley industry and government and we saw tech companies buying influence in the government or profiting off of the public service of these officials.

- Plaintiffs saw lobbying by the President, Vice Presidents Members of Congress, federal judges, and Cabinet Secretaries; and, we saw other federal employees lobbying their former office, department, House of Congress, or agency.

- Plaintiffs saw Plaintiffs competitors immediately hiring or paying these senior government officials from agencies, departments, and/or Congressional offices recently lobbied by those companies and staff from Plaintiffs Senator's office go freely back-and-forth at jobs at the companies and the offices of the Senators.

- Plaintiffs saw the world's largest companies, banks, and monopolies, especially Goldman Sachs, (measured by annual revenue or market capitalization) hiring or paying former senior government officials mentioned herein. Plaintiffs saw the massive, and unfair, ability of companies to buy

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1 *influence through current government employees*

2  
3 *- Plaintiffs saw current lobbyists taking government jobs after lobbying.*

4  
5 *- Plaintiffs saw over 82 of Plaintiffs friends and peers suddenly die under strange circumstances.*  
6 *Some of them appear to have been murdered to shut them up.*

7  
8 *- Plaintiffs saw corporate outlaws like Google, Tesla, Facebook, Linkedin, Netflix, Sony, etc.,*  
9 *working in government via top corporate leaders whose companies were caught breaking federal*  
10 *law.*

11  
12 *- Plaintiffs saw contractor corruption where federal contractors and licensee employees worked at*  
13 *the agency awarding the contracts.*

14  
15 *- Plaintiffs saw “Golden Parachutes” that provide corporate bonuses to executives for federal*  
16 *service as bribes.*

17 *- Plaintiffs saw massive influence-peddling in Washington DC.*

18  
19 *- Plaintiffs saw the manipulation of the federal definition of a “lobbyist” to exclude most*  
20 *individuals paid to influence government.*

21  
22 *- Plaintiffs saw individuals paid to influence government on behalf of for-profit entities and their*  
23 *front-groups who were facades for Silicon Valley oligarchs.*

24  
25 *- Plaintiffs saw the obfuscation of the disclosure of lobbyist activities and influence campaigns*  
26 *where Plaintiffs competitor's lobbyists did not disclose specific bills, policies, and government*  
27 *actions they attempted to influence; nor many meetings with public officials; and many documents*  
28 *they provided to those officials*

1  
2 - Plaintiffs saw massive influence-peddling by Foreign Actors such as that which occurred in the  
3 ENER1, Severstal, Solyndra and related scandals. Plaintiffs saw substantial foreign influence in  
4 Washington by foreign lobbying.

5  
6 - Plaintiffs saw American lobbyists accepting money from foreign governments, foreign individuals,  
7 and foreign companies to influence United States public policy at The U.S. Government and other  
8 agencies.

9  
10 - Plaintiffs saw Plaintiffs competitors current lobbyists taking government jobs after lobbying and  
11 using those positions against us where they exploited 'Legalized Lobbyist Bribery' and traded  
12 money for government favors for Plaintiffs competitors.

13  
14 - Plaintiffs saw political donations from lobbyists to candidates or Members of Congress in  
15 exchange for helping Plaintiffs competitors that the lobbyists worked for and that the Members of  
16 Congress owned stock in. Plaintiffs saw those lobbyists operate contingency fees that allowed those  
17 lobbyists to be paid for a guaranteed public policy outcome.

18  
19 - Plaintiffs saw Plaintiffs competitor's lobbyist gifts to the executive and legislative branch officials  
20 they lobby.

21  
22 - Plaintiffs saw Plaintiffs Congressional representatives use Plaintiffs competitor's lobbyists for  
23 "expertise" and information in Plaintiffs industry.

24 - Plaintiffs saw those in Plaintiffs congressional service get paid non competitive salaries  
25 that do not track with other federal employees.

26  
27 - Plaintiffs saw the removal of the nonpartisan Congressional Office of Technology Assessment to  
28 avoid providing open-source critical scientific and technological support to Members of Congress

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1 in order to tunnel-vision info about Plaintiffs competitors.

2  
3 - Plaintiffs saw a non-level playing field between Plaintiffs competitor's corporate lobbyists and  
4 government via excessive lobbying over \$500,000 in annual lobbying expenditures by Plaintiffs  
5 competitors in a huge number of anti-trust violations.

6  
7 - Plaintiffs saw a COMPLETE failure of individuals and corporations to disclose funding or  
8 editorial conflicts of interest in research submitted to agencies that is not publicly available in peer-  
9 reviewed publications.

10  
11 - Plaintiffs saw McKinsey sham research which undermines the public interest by not requiring that  
12 such studies, that present conflicts of interest, undergo independent peer review to be considered in  
13 the Congressional rule-making process.

14  
15 - Plaintiffs saw agencies refuse to justify withdrawn public interest rules via public, written  
16 explanations.

17 - Plaintiffs saw loopholes exploited by powerful corporations like Google, Facebook, Tesla,  
18 Netflix, Sony, etc., to block public interest actions.

19 - Plaintiffs saw loopholes that allow corporations, like Tesla and Google, to tilt the rules in  
20 their favor and against the public interest.

21  
22 - Plaintiffs saw Silicon Valley oligarchs and their agency skills delay or dominate the rule-making  
23 process by the practice of inviting Google, Tesla or Facebook to negotiate rules they have to follow.

24 - Plaintiffs saw inter-agency review manipulation as a tool for corporate abuse used for the  
25 banning of informal review and closed-door industry lobbying at the White House's Office of  
26 Information and Regulatory Affairs

27  
28 - Plaintiffs saw abusive injunctions from rogue judges, like Jackson, et al, where individual District

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1 Court judges, can temporarily block agencies from implementing final rules.

2  
3 - Plaintiffs saw hostile agencies use sham delays of implementation and enforcement by using the  
4 presence of litigation to postpone the implementation of final rules.

5 - Plaintiffs saw obfuscation by agency public advocates to prevent public engagement.

6 - Plaintiffs saw the blockading of private lawsuits by members of the public to hold agencies  
7 accountable for failing to complete rules or enforce the law, and to hold corporations accountable  
8 for breaking the rules.

9  
10 - Plaintiffs saw a failure to inoculate government agencies against corporate capture such as  
11 Google undertook against the White House.

12  
13 - Plaintiffs saw Plaintiffs complaints and whistle-blowing buried in an avalanche of lobbyist  
14 activity.

15  
16 - Plaintiffs saw Plaintiffs competitor corporations game the courts by requiring courts to  
17 presumptive-ly defer to agency interpretations of laws and prohibiting courts from considering  
18 sham McKinsey studies and research excluded by agencies from the rule-making process

19  
20 - Plaintiffs saw blocking of the Congressional Review Act provision banning related rules that  
21 prevent agencies from implementing the will of Congress based on Congress' prior disapproval of a  
22 different, narrow rule on a similar topic.

23 - Plaintiffs saw a failure in the integrity of the judicial branch by reducing rules that prevent  
24 conflicts of interest.

25 - Plaintiffs saw individual stock ownership by federal judges in Plaintiffs competitors.

26  
27 - Plaintiffs saw judges accepting gifts or payments to attend private seminars from private  
28 individuals and corporations that were Plaintiffs competitors.

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1  
2 - Plaintiffs saw non-ethical behavior by the Supreme Court in which the Court did not follow the  
3 Code of Conduct that binds all other federal judges

4  
5 - Plaintiffs saw a lack of public insight into the judicial process by the hiding of information about  
6 the process and an increase in the barriers to accessing information.

7  
8 - Plaintiffs saw reduced disclosure of non-judicial activity by federal judges and the hiding of  
9 judges' financial reports, recusal decisions, and speeches.

10  
11 - Plaintiffs saw a blockade of public access to court activity by refusing to live-stream, on the web,  
12 audio of their proceedings, making case information easily-accessible to the public free of charge,  
13 and by federal courts not sharing case assignment data in bulk.

14  
15 - Plaintiffs saw Plaintiffs rights restricted and Plaintiffs access to justice blocked to all but the  
16 wealthiest individuals and companies.

17  
18 - Plaintiffs saw barriers that prevented us as individuals from having Plaintiffs case heard in court  
19 via harsh pleading standards that make it too hard for individuals and businesses that have been  
20 harmed to make their case before a judge.

21  
22 - Plaintiffs saw no independent agency dedicated to enforcing federal ethics and anti-corruption  
23 laws.

24  
25 - Plaintiffs saw no support for stronger ethics and public integrity laws via stronger enforcement.

26  
27 - Plaintiffs saw no federal ethics enforcement with effective investigative and disciplinary powers  
28 that would help individuals.

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1  
2 - Plaintiffs saw minimal enforcement of ethics laws via corrective action, levying civil and  
3 administrative penalties, and referring egregious violations to the Justice Department for criminal  
4 arrest and enforcement.

5  
6 - Plaintiffs saw no IG anti-corruption and public integrity oversight over federal officials, including  
7 oversight of agency Inspectors General, or ethics matters for White House staff and agency heads,  
8 or waivers and recusals by senior government officials.

9  
10 - Plaintiffs saw no investigation independent and protected from partisan politics through a single  
11 Director operating under strict selection, appointment, and removal criteria.

12  
13 - Plaintiffs saw Deutsche Bank pay Jeffrey Epstein' Russian hookers and manipulate finances for  
14 Elon Musk to cook the books.

15  
16 - Plaintiffs saw no easy online access to key government ethics and transparency documents,  
17 including financial disclosures; lobbyist registrations; lobbyist disclosures of meetings and  
18 materials; and all ethics records, recusals, and waivers.

19  
20 - Plaintiffs saw no independent and empowered ethics office insulated from congressional politics.

21  
22 - Plaintiffs saw few criminal and civil violations in Plaintiffs case referred to the Justice  
23 Department, the Office of Public Integrity, or other relevant state or federal law enforcement.

24  
25 - Plaintiffs saw broken Federal Open Records laws, public official and candidate tax disclosures.

26 - Plaintiffs saw Silicon Valley Oligarch special interests using secret donations from  
27 corporations and their Cartel of billionaires to influence public policy without disclosure

28 - Plaintiffs saw Google and Facebook provide over a billion dollars of political campaign



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1 *financing with NO action by the FEC.*

2 *- Plaintiffs saw fake tech company 'nonprofit organizations' refuse to list donors who*  
3 *bankrolled the production of any specific rule-making comment, congressional testimony, or*  
4 *lobbying material, and refuse to reveal whether the donors reviewed or edited the document at the*  
5 *Silicon Valley insider companies.*

6  
7 *- Plaintiffs saw the hiding of individuals and corporations disclosures of funding, or editorial*  
8 *conflicts of interest, in research submitted to agencies that is not publicly available in peer-*  
9 *reviewed publications.*

10  
11 *- Plaintiffs saw McKinsey sham "Cleantech" and "battery research" reports undermineg the public*  
12 *interest by using studies that present conflicts of interest to independent peer review to be*  
13 *considered in the rule-making process.*

14  
15 *- Plaintiffs saw loopholes in Plaintiffs open records laws that allow federal officials to hide tech*  
16 *industry and Silicon Valley oligarch industry influence.*

17  
18 *- Plaintiffs saw a failure of the presumption of disclosure and a failure to affirmatively disclose*  
19 *records of public interest, including meeting agendas; government contracts; salaries; staff*  
20 *diversity; and reports to Congress.*

21  
22 *- Plaintiffs saw Tesla Motors get in-person, hand-walked, through the GOVT government*  
23 *cash give-away while all of Tesla's competitors were ignored, black-listed, never communicated*  
24 *with and blockaded.*

25  
26 *- Plaintiffs saw no use of a central FOIA website that is searchable and has downloadable*  
27 *open records databases with all open FOIA requests and all records disclosed through FOIA.*  
28

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1 - Plaintiffs saw limited FOIA enforcement by not limiting FOIA exemptions and loopholes, and by  
2 not giving the National Archives the authority to overrule agency FOIA decisions and to compel  
3 disclosure.

4  
5 - Plaintiffs saw Congress become less transparent by not ending the corporate lobbyists leg up in  
6 the legislative process. The  
7 public deserves to know what Congress is up to and how Silicon Valley lobbyists influence  
8 legislation.

9  
10 - Plaintiffs saw a failure to require all congressional committees to immediately post online more  
11 information, including hearings and markup schedules, bill or amendments text, testimonies,  
12 documents entered into the hearing record, hearing transcripts, written witness answers, and  
13 hearing audio and video recordings.

14  
15 - Plaintiffs saw a refusal of Members of Congress to post a link to their searchable voting record on  
16 their official websites

17  
18 - Plaintiffs saw a hiding, by Silicon Valley lobbyists of when they lobby a specific congressional  
19 office; specific topics of visit; the official action being requested; and all documents provided to the  
20 office during the visit.

21 - Plaintiffs saw much, much more...

22 Any politician who allows these crimes and corruptions to continue to exist is part of those  
23 crimes and corruptions. never believe any candidate who does not swear to end each of the above  
24 listed payola and corruption processes!

25 **IF AMERICA WAS SERIOUS ABOUT ENDING CORRUPTION, IT WOULD**  
26 **MAKE THE ABOVE ILLICIT DEEDS A FELONY, BUT THE CALIFORNIA**  
27 **POLITICIANS WILL DO ANYTHING TO KEEP THEIR PIG TROUGH GOING!**

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## **EXHIBIT 38 - The Ongoing Attacks On The Members Of The Public Who Reported These Crimes**

The victim's cases have never been fairly reviewed by non-biased, non-conflicted officials. The victim's FBI-class investigators and peers have not found a single entity in the government's case reviews, or determinations, who was not either: financed by, friends with, sleeping with, dating the staff of, holding stock market assets in, promised a revolving door job or government service contracts from, partying with, personal friends with, photographed at private events with, making profits by consulting for, exchanging emails with, business associates of or directed by; one of those business adversaries, or the Senators and politicians that those business adversaries pay campaign finances to, or supply political search engine manipulation services to. FBI and CIA-class Forensic data proves it.

The victims have demanded, in writing to SSA, DOJ, OSC, SEC, FBI, that an unbiased lawyer and CPA be provided by The State for the case but none has been provided. As they are now low-income, senior, disabled, felony crime victims, the federal government's LSC Corporation and public-interest law groups have stated that it is their right to receive such case assistance from The State. The victims have contacted NOSSCR, LSC, Legal Aid, NADR, and all known local resources on the list provided by the feds but none of those taxpayer funded entities have been responsive because they are helping the cover-ups.

The assertions provided by a Task Force team of 3 letter agency folks, Congressional staff, investigative reporters and crowd-sourced voters supporting the case investigations are beyond reproach, and true, unless someone refuses to hear the truth due to a personal political agenda.

The victim's government-promised benefits have STILL yet to be provided to them and many of the actions by politically conflicted federal officials, so far, have succeeded in harming the victims further. The peers of the victims have received millions and millions of dollars for their Department of Energy, and other agency, whistle-blowing but the other victims have been blocked from getting legal support.

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1 These abuses and benefits blockades are a violation of the victim's human rights, U.S.  
2 Constitution and State Constitutional rights. (Yes, each State has constitutional rights you get, too)

3 The victims put their lives on the line for their country. They have worked 60 hours, or  
4 more, per week, since the 70's. They more than earned their full benefits plus damages, interest and  
5 back-fees equal to precedents set in the referenced whistle-blower court cases, below.

6 The victims are fully qualified for, and have the right to receive, a State supplied law firm to  
7 represent them but they have been blockaded from their rights because corrupt political figures are  
8 embarrassed about their crimes being exposed.

9 Elected officials and agency staff have one job, that job it is to work for THESE VICTIMS  
10 the citizens. Those politicians, though, have been shown to have millions of dollars in their stock  
11 market accounts from competing with these victims via their ownership in competing companies  
12 that they are supposed to be regulating.

13 At least one of the California Senators has over \$100 million dollars in their accounts, (a fact  
14 the FBI can confirm), from stock market manipulations like this. Politically driven, and greed  
15 motivated, agency staff are constantly looking for any little opportunity or reason to use agency  
16 resources to harm any whistle-blower in reprisal for the success of the anti-corruption task forces  
17 they have assisted.

18 Federal officials stealth-hired Google, Gawker, Gizmodo, YouTube, In-Q-Tel, Fusion GPS  
19 and Black Cube to produce tens of millions of dollars of political reprisal media attacks and  
20 coordinate toxic exposures against the victims. The attacks have been proven by federal and private  
21 investigators to have happened, The source of the attacks, the financiers of the attacks, the  
22 beneficiaries of the attacks and the operators of the attacks are the same handful of government  
23 people.

24 The victims are seeking an analytical, objective, reasonable, non-political review of their  
25 case. Unlike Julian Assange, Edward Snowden and other whistle-blowers, not only did they do  
26 nothing illegal but they are law enforcement and intelligence service consultant who HELP the  
27 nation! They are Smedley Butler-like and not Edward Snowden-like!

28 It is foolish for any party to ignore the capacity for crime that the Jeffrey Epstein, Harvey

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1 Weinstein (ie: his threat to have Jennifer Aniston killed for reporting his sex crimes) and Larry Page  
2 oligarchs get involved in, along with the Senators they own and control.

3 The nature of the core crime case is profound in that it was driven by White House staff and  
4 United States Senators, who ordered attacks on the victims in reprisal. These famous political  
5 figures use the trillions of dollars in government treasuries and massive stock market scams for  
6 illicit profiteering by rigging the system exclusively for themselves and their crony insiders.

7 They attacked the victims using government taxpayer funded media (Fusion GPS, Black  
8 Cube, Google/YouTube/Alphabet, Pysops, Gizmodo Media, Media Matters, Blumenthal, etc.) and  
9 spy agency tools because the victims competed with their businesses and reported their crimes. This  
10 month the news headlines reveal that San Francisco Bay Area government has as many corrupt  
11 politicians as Chicago and relies on the same RICO-violating insider corruption network to operate;  
12 as proven by deep AI searches of their financial records. Arrests of those officials are now  
13 underway.

14  
15 Silicon Valley law enforcement records prove that the tech oligarchs that finance these political  
16 figures, engage in an organized, racketeering-based, massive sex trafficking, tax evasion, anti-trust  
17 violating, spousal abuse, money laundering, black-listing, racist, ageist, political bribery, crony  
18 racketeering crime Cartel. The Famous U.S. Senators, Governors and their staff knowingly engage  
19 in, finance, operate and benefit from these crimes in exchange for search engine manipulation and  
20 stock market insider trading.

21 The Google, Facebook and Twitter components of this Cartel censor and cover-up news  
22 coverage of these crimes, and attacked the victims, because they have a financial connection to the  
23 perpetrators.

24 All of the crooks have had their files hacked. The evidence is out there at the NSA, FBI, etc.  
25 Even hackers from Russia and China have copies of the incriminating data. The bad guys will  
26 eventually lose!

27 It is unlikely that any whistle-blowers have as productive a domestic resume, as many letters  
28 of reference from famous third-parties and as much proof-of-work as these victims have proven in

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1 their evidence sets. The victims have been friends with, and shared homes with, multiple White  
2 House and Senate staff and family members and some them have even vouched for the victims.  
3 These whistle-blowers know the 'inside scoop'.

4 The victims are bi-partisan and not affiliated with any political party but they hate political  
5 corruption and have the connections to fight it when it affects them and America. Pictures and  
6 videos of famous political figures hugging them and meeting with them abound.

7 In a positive turn of events Whistle-blower Walter Tamosaitis” (easily found on web  
8 searches) who was also a Department of Energy Whistle-blower, got a rare victory. Walter got \$4.1  
9 MILLION DOLLARS for his whistle-blower work about The U.S. Government malfeasance.

10 The rest of the victims have gotten nothing but punishing benefits blockades and benefit  
11 reductions that guaranteed they would never be able to afford rent, going to a show or a restaurant,  
12 legal services or anything else in their lives! One of the people they helped get arrested sits around  
13 and drinks and collects over \$150,000.00 per year in government benefits...and they are an arrested  
14 crook. The victims are having a hard time seeing how they have been treated fairly in light of their  
15 deeply documented public service!

16 SSA, and other agencies, were weaponized as political reprisal tools against the victims.  
17 James Brown, Jr, the HHS California head of Obamacare was arrested by the FBI for political  
18 corruption and racketeering during this. In Marin county HHS investigators were also arrested for  
19 sex crime. These tiny victories do not pay the rent for the victims, though.

20 Some of the victims were awarded a Congressional commendation award in the Iraq War  
21 Bill under the United States Congress. They, and their team were to build America's alternative  
22 energy back-up plan for the nation under the Department of Energy. They fully executed their  
23 federal agreement and did not go bankrupt, embezzle funds, bribe California politicians or get FBI-  
24 raided like their competitor: Solyndra!

25 -----  
26  
27  
28

**EXHIBIT 38 – How U.S. Senators, Agency Heads And Congress-People Were bribed With These Payments**

Billions of dollars of Google, Twitter, Facebook, Tesla, Netflix and Sony Pictures stock and stock warrants which is never reported to the FEC; Billions of dollars of Google, Twitter, Facebook, Tesla, Netflix and Sony Pictures search engine rigging and shadow-banning which is never reported to the FEC; Free rent; Male and female prostitutes; Cars; Dinners; Party Financing; Sports Event Tickets; Political campaign printing and mailing services "Donations"; Secret PAC Financing; Jobs in Corporations in Silicon Valley For The Family Members of Those Who Take Bribes And Those Who Take Bribes; "Consulting" contracts from McKinsey as fronted pay-off gigs; Overpriced "Speaking Engagements" which are really just pay-offs conduited for donors; Private jet rides and use of Government fuel depots (ie: Google handed out NASA jet fuel to staff); Real Estate; Fake mortgages; The use of Cayman, Boca Des Tores, Swiss and related money-laundering accounts; Bribes to Stanford officials to admit their kids to college; The use of HSBC, Wells Fargo, Goldman Sachs and Deutsche Bank money laundering accounts and covert stock accounts; Free spam and bulk mailing services owned by Silicon Valley corporations; Use of high tech law firms such as Perkins Coie, Wilson Sonsini, MoFo, Covington & Burling, etc. to conduit bribes to officials; and other means now documented by us, The FBI, the FTC, The SEC, The FEC and journalists.

Part of this matter was featured on CBS News 60 Minutes investigative news segments. (ie: the segments: "THE CLEANTECH CRASH", "CONGRESS TRADING ON INSIDER INFORMATION", "THE LOBBYISTS PLAYBOOK" and investigations into hundreds of billions of dollars of stock market payola illicitly routed through Silicon Valley tech companies). If the White House, at that time, had been charged for these stock market campaign payola crimes, The President would have been forced out of office. Instead, the AG, Eric Holder, was impeached/Held-In-Contempt-Of Congress and he had to leave office.

This is why the attacks on the victims have been so spy agency-oriented and sophisticated: To punish them for helping law enforcement and because the victims accidentally competed with Senator's stock market schemes by making their products obsolete via BETTER products.



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1 There are now thousands of news and Congressional reports; from “Spygate”, to The IRS  
2 Lois Lerner case to the FBI McCabe case and a vast number of SSA IG reports, particularly SSA  
3 about government agencies being weaponized against citizens for political reprisals. Compromised  
4 staff used SSA resources to harm the whistle-blowers and block their benefits because they helped  
5 halt one of the largest corruption schemes in modern American history.

6 This case is still an active case via many federal law enforcement and regulatory agencies.  
7 Some of the victims were cellular-level blood poisoned by exposure to toxic chemicals, compounds,  
8 powders and radioactive materials in their work environments for The U.S. Government projects. It  
9 is unclear if this poisoning was intentional “Alexander Valterovich Litvinenko-like” reprisal  
10 poisoning or accidental. The minimal Obamacare medical coverage that some of the victims have  
11 does not fund the testing and treatment of Cesium, Thorium overdose, micro-particulant toxins,  
12 radical solvents, high energy EMF and the kinds of exotic materials that Department of Energy  
13 weapons and energy labs, that victims worked with, use in their locations.

14 While the victims benefits application was underway in one part of the federal building, on  
15 the upper floors of the same building, victims were assisting a federal crime investigation against  
16 powerful local and Washington DC politicians and their oligarch financiers, on other floors of that  
17 federal building, corrupt political officials were figuring out how to harm the victims and engage in  
18 reprisals.

19 From FBI-class federal investigators and private investigators, records prove that well  
20 known California Senate officials and well known White House officials ordered government  
21 benefits to be blocked, delayed, obfuscated, denied and otherwise harmed as political reprisal and  
22 retribution for the assistance the victims supplied to law enforcement.

23 Criminal forensic data has proven that digital manipulation of some of victims records and  
24 files did occur and that SSA computers are regularly hacked by many parties including the China  
25 'Cloud Hopper' APT 10 group, currently under federal indictment, and hundreds of domestic attack  
26 groups, some of whom are hired by U.S. Senators. A number of California and Washington DC  
27 Senators and agency heads have already been arrested, indicted and/or removed from office in these  
28 matters.

Over 40 of the victims peers in this matter (Rajeev Motwani, Gary D. Conley, Seth Rich, Dr. Epstein's wife, etc. ) are now dead from mysterious circumstances. Victims have received numerous death threats and have been personally attacked on multiple occasions including getting their cars rammed and drive-by death threats.

Some of those victims may have been murdered for whistle-blowing. Multiple senior government officials and Senators have been exposed hiring Google, YouTube, Fusion GPS, In-Q-Tel, PsyOps, Cambridge Analytica, ShareBlue, Media Matters, Black Cube, Gizmodo and other "kill services" to attack citizens in political reprisals.

[\*Pelosi, Feinstein & Congress Cash in on Insider Trading | RepresentUs\*](#)

[\*https://represent.us/action/insider-trading/\*](https://represent.us/action/insider-trading/)

In 2011, a CBS investigation blew the lid off of one of Washington's most poorly-kept secrets: members of **Congress** were routinely exploiting legal loopholes to engage in **insider trading** and line their own pockets — a criminal offense for regular citizens. In the ensuing public outrage, **Congress** passed a law called the STOCK Act, and took a [...]

[\*Congress: California Senators Trading stock on inside information? - CBS News\*](#)

[\*https://www.cbsnews.com/news/congress-trading-stock-on-inside-information/\*](https://www.cbsnews.com/news/congress-trading-stock-on-inside-information/)

**Congress: Trading** stock on inside information? ... But, congressional lawmakers have no corporate responsibilities and have long been considered exempt from **insider trading** laws, even though they ...

[\*Congress Tells Court That Congress Can't Be Investigated ...\*](#)

[\*https://theintercept.com/2015/05/07/congress-argues-cant-investigated-insider-trading/\*](https://theintercept.com/2015/05/07/congress-argues-cant-investigated-insider-trading/)

But as the Securities and Exchange Commission made news with the first major investigation of political **insider trading**, **Congress** moved to block the inquiry.

[\*Reckless stock trading leaves Congress rife with corruption ... - POLITICO\*](#)

[\*https://www.politico.com/story/2017/05/14/congress-stock-trading-conflict-of-interest-rules-238033\*](https://www.politico.com/story/2017/05/14/congress-stock-trading-conflict-of-interest-rules-238033)

POLITICO Investigation. Reckless stock **trading** leaves **Congress** rife with conflicts . After the furor over Tom Price's investments, four more members quietly bought shares in the same firm.

[Nancy Pelosi Built Wealth on 'Insider Trading', that's where her covert \\$120M came from...](#)

 <https://thepoliticalinsider.com/nancy-pelosi-insider-trading/>

"Nancy Pelosi has engaged in **insider trading**," Hill said, "because she's been the beneficiary of information that other people wouldn't have, so Paul **Pelosi** is able to make active trades on her **insider** knowledge." Listen below:

[Apple Google Silicon Valley No Cold Calling Anti-Poaching](#)

 <https://www.lieffcabraser.com/antitrust/high-tech-employees/>


**Silicon Valley** firms and other **high-tech** companies owe their tremendous successes to the sacrifices and hard work of their employees, and must take responsibility for their misconduct. One of the principal means by which **high-tech** companies recruit employees is to solicit them directly from other companies in a process referred to as "cold ...

[Engineers Allege Hiring Collusion in Silicon Valley - The ...](#)

 <https://www.nytimes.com/2014/03/01/technology/engineers-allege-hiring-collusion-in-silicon-valley.html>

Mar 1, 2014 Alan Hyde, a Rutgers professor who wrote "Working in **Silicon Valley**: Economic and Legal Analysis of a **High-Velocity** Labor Market," said the **no-poaching** accusations go contrary to what has made ...

[Apple, Google and others to pay \\$415m to settle Silicon ...](#)

 <https://www.telegraph.co.uk/technology/news/11843237/Apple-Google-and-others-to-pay-415m-to-settle-Silicon-Valley-no-poaching-lawsuit.html>


Apple, Google and others to pay \$415m to settle **Silicon Valley 'no poaching' lawsuit** US judge agrees settlement that will see thousands of technology workers receive thousands of dollars

[Dirty Secrets of Silicon Valley Poaching | Paysa](#)

 <https://www.paysa.com/blog/dirty-secrets-of-silicon-valley-poaching/>


**Silicon Valley** is a talent magnet. With prestigious **high-tech** corporations such as Google, Apple, Facebook, Netflix, and Tesla Motors among the Fortune 1000 companies and thousands of startups finding their home in the world-renowned technology hub, this comes as **no** surprise.

[Silicon Valley no-poaching deal appears headed for approval](#)

 <https://phys.org/news/2015-03-silicon-valley-no-poaching.html>


**Silicon Valley no-poaching** deal appears headed for approval. by Howard Mintz, San Jose  
Mercury News

[Silicon Valley's \\$415 million poaching settlement finalized](#)

 <https://www.mercurynews.com/2015/09/03/silicon-valleys-415-million-poaching-settlement-finalized/>

Sep 3, 2015**Silicon Valley's \$415 million poaching** settlement finalized ... **valley-tech-**  
giants-learn-from-**no-poaching**-antitrust-case/ 'When Rules Don't Apply': Did **Silicon Valley tech**  
giants learn from **no** ...

[Justice Department Requires Six High Tech Companies to ...](#)

 <https://www.justice.gov/opa/pr/justice-department-requires-six-high-tech-companies-stop-entering-anticompetitive-employee>

One of the complaints arose out of a larger investigation by the Antitrust Division into  
employment practices by **high tech** firms. The division continues to investigate other similar **no**  
solicitation agreements. Adobe Systems Inc. is a Delaware corporation with its principal place of  
business in San Jose, Calif., and 2009 revenues of nearly \$3 billion.

Cold calling is one of the main methods used by companies in the high-technology sector to recruit  
employees with advanced and specialised skills, such as software and hardware engineers,  
programmers, animators, digital artists, Web developers and other technical professionals.<sup>[1]</sup> Cold  
calling involves communicating directly in any manner with another firm's employee who has not  
otherwise applied for a job opening. Cold calling may be done in person, by phone, letter, or email.  
<sup>[2]</sup> According to the legal brief filed by a Plaintiffs in one of the class-action cases, cold calling is  
an effective method of recruiting for the high-technology sector because "employees of other [high-  
technology] companies are often unresponsive to other recruiting strategies... [and] current satisfied  
employees tend to be more qualified, harder working, and more stable than those who are actively  
looking for employment."<sup>[3]</sup>

1 Amy Lambert, Google's associate general counsel, noted in a blog post shortly after the  
2 DOJ's actions, that Google's definition of cold calling does not necessarily eliminate recruiting by  
3 letter or email, but only the process of calling on the telephone. By implication, recruiting through  
4 LinkedIn incurs recruiting by "InMail" - LinkedIn's own mail contact system: "In order to maintain  
5 a good working relationship with these companies, in 2005 we decided not to "cold call" employees  
6 at a few of Plaintiffs partner companies. Plaintiffs policy only impacted cold calling, and we  
7 continued to recruit from these companies through LinkedIn, job fairs, employee referrals, or when  
8 candidates approached Google directly. In fact, we hired hundreds of employees from the  
9 companies involved during this time period."

10 The challenged "no cold call" agreements are alleged bilateral agreements between high  
11 technology companies not to cold call each other's employees. The DOJ alleges that senior  
12 executives at each company negotiated to have their employees added to 'no call' lists maintained by  
13 human resources personnel or in company hiring manuals. The alleged agreements were not limited  
14 by geography, job function, product group, or time period. The alleged bilateral agreements were  
15 between: (1) Apple and Google, (2) Apple and Adobe, (3) Apple and Pixar, (4) Google and Intel,  
16 (5) Google and Intuit,[\[4\]](#) and (6) Lucasfilm and Pixar.[\[5\]](#)

17 The civil class action further alleges that agreements also existed to (1) "provide notification  
18 when making an offer to another [company]'s employee (without the knowledge or consent of the  
19 employee)" and (2) "agreements that, when offering a position to another company's employee,  
20 neither company would counteroffer above the initial offer."[\[3\]](#)

### 21 **Department of Justice antitrust action**

22 The [United States Department of Justice Antitrust Division](#) filed a complaint in the [US](#)  
23 [District Court for the District of Columbia](#) alleging violations of Section 1 of the [Sherman Act](#). In  
24 *US v. Adobe Systems Inc., et al.*, the Department of Justice alleged that Adobe, Apple, Google, Intel,  
25 Intuit, and Pixar had violated Section 1 of the Sherman Act by entering into a series of bilateral "No  
26 Cold Call" Agreements to prevent the recruitment of their employees (a similar but separate suit  
27 was filed against Lucasfilm on December 21, 2010[\[6\]](#)).

28 ( [https://en.wikipedia.org/wiki/High-Tech\\_Employee\\_Antitrust\\_Litigation#cite\\_note-6](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation#cite_note-6) )

1 The DOJ alleged in their Complaint that the companies had reached "facially  
2 anticompetitive" agreements that "eliminated a significant form of competition...to the detriment of  
3 the affected employees who were likely deprived of competitively important information and access  
4 to better job opportunities." The DOJ also alleged that the agreements "were not ancillary to any  
5 legitimate collaboration," "were much broader than reasonably necessary for the formation or  
6 implementation of any collaborative effort," and "disrupted the normal price-setting mechanisms  
7 that apply in the labor setting."<sup>[4]</sup> The same day it filed the suit, the DOJ and the defendants  
8 proposed a settlement.<sup>[7]</sup>

9 ( [https://en.wikipedia.org/wiki/High-Tech\\_Employee\\_Antitrust\\_Litigation#cite\\_note-](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation#cite_note-doj_case_proposed_settlement-7)  
10 [doj\\_case\\_proposed\\_settlement-7](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation#cite_note-doj_case_proposed_settlement-7) )

11 A final judgment enforcing the settlement was entered by the court on March 17, 2011.<sup>[8]</sup>  
12 ( [https://en.wikipedia.org/wiki/High-Tech\\_Employee\\_Antitrust\\_Litigation#cite\\_note-](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation#cite_note-doj_adobe_final_judgement-8)  
13 [doj\\_adobe\\_final\\_judgement-8](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation#cite_note-doj_adobe_final_judgement-8) )

14 Although the DOJ Complaint only challenged the alleged "no cold call" agreements, in the  
15 settlement, the companies agreed to a more broad prohibition against "attempting to enter into,  
16 entering into, maintaining or enforcing any agreement with any other person to in any way refrain  
17 from, requesting that any person in any way refrain from, or pressuring any person in any way to  
18 refrain from soliciting, cold calling, recruiting, or otherwise competing for employees of the other  
19 person", for a period of five years; the court can grant an extension.<sup>[8]</sup>

20 ( [https://en.wikipedia.org/wiki/High-Tech\\_Employee\\_Antitrust\\_Litigation#cite\\_note-](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation#cite_note-doj_adobe_final_judgement-8)  
21 [doj\\_adobe\\_final\\_judgement-8](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation#cite_note-doj_adobe_final_judgement-8) )

22 The settlement agreement does not provide any compensation for company employees  
23 affected by the alleged agreements.<sup>[9]</sup>

24 ( [https://en.wikipedia.org/wiki/High-Tech\\_Employee\\_Antitrust\\_Litigation#cite\\_note-](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation#cite_note-judge oks-9)  
25 [judge oks-9](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation#cite_note-judge oks-9) )

26 Lucasfilm entered into a similar settlement agreement in December 2010.<sup>[5]</sup>

27 ( [https://en.wikipedia.org/wiki/High-Tech\\_Employee\\_Antitrust\\_Litigation#cite\\_note-](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation#cite_note-Richey-5)  
28 [Richey-5](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation#cite_note-Richey-5) )

**Civil class action**

*In re: High-Tech Employee Antitrust Litigation* ([U.S. District Court, Northern District of California](#) 11-cv-2509 [\[10\]](#)) is a [class-action](#) lawsuit on behalf of over 64,000 employees of [Adobe](#), [Apple Inc.](#), [Google](#), [Intel](#), [Intuit](#), [Pixar](#) and [Lucasfilm](#) (the last two are subsidiaries of [Disney](#)) against their employer alleging that their wages were repressed due to alleged agreements between their employers not to hire employees from their competitors.[\[11\]\[12\]](#) The case was filed on May 4, 2011 by a former software engineer at Lucasfilm and alleges violations of California's antitrust statute, Business and Professions Code sections 16720 et seq. (the "Cartwright Act"); Business and Professions Code section 16600; and California's unfair competition law, Business and Professions Code sections 17200, et seq. Focusing on the network of connections around former Apple CEO [Steve Jobs](#), the Complaint alleges "an interconnected web of express agreements, each with the active involvement and participation of a company under the control of Steve Jobs...and/or a company that shared at least one member of [Apple's board of directors](#)." The alleged intent of this conspiracy was "to reduce employee compensation and mobility through eliminating competition for skilled labor."[\[13\]](#)

On October 24, 2013 the [United States District Court for the Northern District of California](#) granted class certification for all employees of Defendant companies from January 1, 2005 through January 1, 2010.[\[9\]](#)

As of October 31, 2013, Intuit, Pixar and Lucasfilm have reached a tentative settlement agreement. Pixar and Lucasfilm agreed to pay \$9 million in damages, and Intuit agreed to pay \$11 million in damages.[\[9\]](#) In May 2014, Judge [Lucy Koh](#) approved the \$20 million settlement between Lucasfilm, Pixar, and Intuit and their employees. Class members in this settlement, which involved fewer than 8% of the 65,000 employees affected, will receive around \$3,840 each.[\[14\]](#)

The trial of the class action for the remaining Defendant companies was scheduled to begin on May 27, 2014. The Plaintiffs intended to ask the jury for \$3 billion in compensation, a number which could in turn have tripled to \$9 billion under antitrust law.[\[15\]](#) However, in late April 2014, the four remaining defendants, [Apple Inc.](#), [Google](#), [Intel](#) and [Adobe Systems](#), agreed to settle out of court. Any settlement must be approved by Judge [Lucy Koh](#).[\[16\]\[17\]](#)

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1 On May 23, 2014, Apple, Google, Intel, Adobe agreed to settle for \$324.5 million. Lawyers  
2 sought 25% in attorneys' fees, plus expenses of as much as \$1.2 million, according to the filing.  
3 Additional award payments of \$80,000 would be sought for each named Plaintiffs who served as a  
4 class representative.[\[18\]](#) Payouts will average a few thousand dollars based on the salary of the  
5 employee at the time of the complaint.

6 In June 2014, Judge Lucy Koh expressed concern that the settlement may not be a good one  
7 for the Plaintiffs. Michael Devine, one of the Plaintiffs, said the settlement is unjust. In a letter he  
8 wrote to the judge he said the settlement represents only one-tenth of the \$3 billion in compensation  
9 the 64,000 workers could have made if the defendants had not colluded.[\[19\]](#)

10 On August 8, 2014, Judge Koh rejected the settlement as insufficient on the basis of the  
11 evidence and exposure. Rejecting a settlement is unusual in such cases. This left the defendants with  
12 a choice between raising their settlement offer or facing a trial.[\[20\]](#)

13 On September 8, 2014, Judge Koh set April 9, 2015 as the actual trial date for the remaining  
14 defendants, with a pre-trial conference scheduled for December 19, 2014. Also, as of early  
15 September 2014, the defendants had re-entered mediation to determine whether a new settlement  
16 could be reached.[\[21\]](#)

17 A final approval hearing was held on July 9, 2015.[\[22\]](#) On Wednesday September 2, 2015,  
18 Judge Lucy H. Koh signed an order granting Motion for Final Approval of Class Action Settlement.  
19 The settlement website stated that Adobe, Apple, Google, and Intel has reached a settlement of  
20 \$415 million and other companies settled for \$20 million.

21 According to the settlement website, Gilardi & Co., LLC distributed the settlement to class  
22 members the week of December 21, 2015.

23 See also

- 24 • [Corrupt Eric Schmidt And His Role In The Illegal Collusion](#)
  - 25 • [Antipoaching](#)
- 26  
27  
28



**EXHIBIT 39 - The Tectopus: How Silicon Valley's most celebrated CEOs conspired to drive down 100,000 tech engineers' wages**

- A Federal Lawsuit Inspired By Plaintiffs Actions

By Mark Ames

In early 2005, as demand for Silicon Valley engineers began [booming](#), Apple's Steve Jobs sealed a secret and illegal pact with Google's Eric Schmidt to artificially push their workers wages lower by agreeing not to recruit each other's employees, sharing wage scale information, and punishing violators. On February 27, 2005, Bill Campbell, a member of Apple's board of directors and [senior advisor](#) to Google, emailed Jobs to confirm that Eric Schmidt "got directly involved and firmly stopped all efforts to recruit anyone from Apple."

Later that year, Schmidt instructed his Sr VP for Business Operation Shona Brown to keep the pact a secret and only share information "verbally, since I don't want to create a paper trail over which we can be sued later?"

These secret conversations and agreements between some of the biggest names in Silicon Valley were first exposed in a Department of Justice antitrust [investigation](#) launched by the Obama Administration in 2010. That DOJ suit became the basis of a [class action lawsuit](#) filed on behalf of over 100,000 tech employees whose wages were artificially lowered — an [estimated \\$9 billion](#) effectively stolen by the high-flying companies from their workers to pad company earnings — in the second half of the 2000s. Last week, the 9th Circuit Court of Appeals denied attempts by Apple, Google, Intel, and Adobe to have the lawsuit tossed, and gave final approval for the class action suit to go forward. A jury trial date has been set for May 27 in San Jose, before US District Court judge Lucy Koh, who presided over the Samsung-Apple patent suit.

In a related but separate investigation and ongoing suit, eBay and its former CEO Meg Whitman, now CEO of HP, are being sued by both the [federal government](#) and the [state of California](#) for arranging a similar, secret wage-theft agreement with Intuit (and possibly Google as

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1 well) during the same period.

2 The secret wage-theft agreements between Apple, Google, Intel, Adobe, Intuit, and Pixar  
3 (now owned by Disney) are described in court papers obtained by PandoDaily as "an overarching  
4 conspiracy" in violation of the Sherman Antitrust Act and the Clayton Antitrust Act, and at times it  
5 reads like something lifted straight out of the robber baron era that produced those laws. Today's  
6 inequality crisis is America's [worst on record](#) since statistics were first recorded a hundred years ago  
7 — the only comparison would be to the era of the railroad tycoons in the late 19th century.

8 Shortly after sealing the pact with Google, Jobs strong-armed Adobe into joining after he  
9 complained to CEO Bruce Chizen that Adobe was recruiting Apple's employees. Chizen sheepishly  
10 responded that he thought only a small class of employees were off-limits:

11 I thought we agreed not to recruit any senior level employees.... I would propose we keep it  
12 that way. Open to discuss. It would be good to agree.

13 Jobs responded by threatening war:

14 OK, I'll tell Plaintiffs recruiters they are free to approach any Adobe employee who is not a  
15 Sr. Director or VP. Am I understanding your position correctly?

16 Adobe's Chizen immediately backed down:

17 I'd rather agree NOT to actively solicit any employee from either company.....If you are in  
18 agreement, I will let my folks know.

19 The next day, Chizen let his folks — Adobe's VP of Human Resources — know that "we are  
20 not to solicit ANY Apple employees, and visa versa." Chizen was worried that if he didn't agree,  
21 Jobs would make Adobe pay:

22 if I tell Steve [Jobs] it's open season (other than senior managers), he will deliberately poach  
23 Adobe just to prove a point. Knowing Steve, he will go after some of Plaintiffs top Mac talent...and  
24 he will do it in a way in which they will be enticed to come (extraordinary packages and Steve  
25 wooing).

26 Indeed Jobs even threatened war against Google early 2005 before their "gentlemen's  
27 agreement," telling Sergey Brin to back off recruiting Apple's Safari team:

28 if you [Brin] hire a single one of these people that means war.

1 Brin immediately advised Google's Executive Management Team to halt all recruiting of  
2 Apple employees until an agreement was discussed.

3 In the geopolitics of [Silicon Valley tech power](#), Adobe was no match for a corporate  
4 superpower like Apple. Inequality of the sort we're experiencing today affects everyone in ways we  
5 haven't even thought of — whether it's Jobs bullying slightly lesser executives into joining an illegal  
6 wage-theft pact, or the tens of thousands of workers whose wages were artificially lowered,  
7 transferred into higher corporate earnings, and [higher compensations](#) for those already richest and  
8 most powerful to begin with.

9 Over the next two years, as the tech industry entered another frothing bubble, the secret  
10 wage-theft pact which began with Apple, Google and Pixar expanded to include Intuit and Intel.  
11 The secret agreements were based on relationships, and those relationships were forged in Silicon  
12 Valley's [incestuous boards of directors](#), which in the past has been recognized mostly as a problem  
13 for shareholders and corporate governance advocates, rather than for the tens of thousands of  
14 employees whose wages and lives are viscerally affected by their clubby backroom deals. Intel CEO  
15 Paul Otellini [joined](#) Google's board of directors in 2004, a part-time gig that netted Otellini [\\$23](#)  
16 [million in 2007](#), with tens of millions more in Google stock options still in his name — which  
17 worked out to \$464,000 per Google board event if you only counted the stock options Otellini  
18 cashed out — dwarfing what Otellini made off his Intel stock options, despite spending most of his  
19 career with the company.

20 Meanwhile, Eric Schmidt served on Apple's board of directors until 2009, when a [DoJ](#)  
21 [antitrust investigation](#) pushed him to resign. Intuit's chairman at the time, Bill Campbell, also served  
22 on Apple's board of directors, and as official advisor — ["consigliere"](#) — to Google chief Eric  
23 Schmidt, until he [resigned](#) from Google in 2010. Campbell, a celebrated figure ("a quasi-religious  
24 force for good in Silicon Valley") played a key behind-the-scenes role connecting the various CEOs  
25 into the wage-theft pact. Steve Jobs, who took regular Sunday walks with Campbell near their Palo  
26 Alto homes, valued Campbell for his ability "to get A and B work out of people," gushing that the  
27 conduit at the center of the \$9 billion wage theft suit, ["loves people, and he loves growing people."](#)

28 Indeed. Eric Schmidt has been, if anything, even more profuse in his praise of Campbell.

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1 Schmidt credits Campbell for structuring Google when Schmidt was brought on board in 2001:

2 His contribution to Google — it is literally not possible to overstate. He essentially  
3 architected the organizational structure.

4 Court documents show it was Campbell who first brought together Jobs and Schmidt to  
5 form the core of the Silicon Valley wage-theft pact. And Campbell's name appears as the early  
6 conduit bringing Intel into the pact with Google:

7 Bill Campbell (Chairman of Intuit Board of Directors, Co-Lead Director of Apple, and  
8 advisor to Google) was also involved in the Google-Intel agreement, as reflected in an email  
9 exchange from 2006 in which Bill Campbell agreed with Jonathan Rosenberg (Google Advisor to  
10 the Office of CEO and former Senior Vice President of Product Management) that Google should  
11 call [Intel CEO] Paul Otellini before making an offer to an Intel employee, regardless of whether  
12 the Intel employee first approached Google.

13 Getting Google on board with the wage-theft pact was the key for Apple from the start  
14 — [articles](#) in the tech press in 2005 pointed at Google's recruitment drive and incentives were the  
15 key reason why tech wages soared that year, at the highest rate in well over a decade.

16 Campbell helped bring in Google, Intel, and, in 2006, Campbell saw to it that Intuit — the  
17 company he [chaired](#) — also joined the pact.

18 From the peaks of Silicon Valley, Campbell's interpersonal skills were [magical](#) and awe-  
19 inspiring, a crucial factor in creating so much unimaginable wealth for their companies and  
20 themselves. Jobs [said](#) of Campbell:

21 There is something deeply human about him.

22 And Schmidt [swooned](#):

23 He is my closest confidant...because he is the definition of trust.

24 Things — and people — look very different when you're down in the Valley. In the nearly  
25 100-page court opinion issued last October by Judge Koh granting class status to the lawsuit,  
26 Campbell comes off as anything but mystical and "deeply human." He comes off as a scheming  
27 consigliere carrying out some of the drearier tasks that the oligarchs he served were constitutionally  
28 not so capable of arranging without him.

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1 But the realities of inequality and capitalism invariably lead to mysticism of this sort, a  
2 natural human response to the dreary realities of concentrating so much wealth and power in the  
3 hands of a dozen interlocking board members at the expense of 100,000 employees, and so many  
4 other negative knock-off effects on the politics and culture of the world they dominate.

5 One of the more telling elements to this lawsuit is the role played by "Star Wars" creator  
6 George Lucas, who emerges as the Obi-Wan Kenobi of the wage-theft scheme. It's almost too  
7 perfectly symbolic that Lucas — the symbiosis of Baby Boomer New Age mysticism, Left Coast  
8 power, political infantilism, and dreary 19th century labor exploitation — should be responsible for  
9 dreaming up the wage theft scheme back in the mid-1980s, when Lucas sold the computer  
10 animation division of Lucasfilm, Pixar, to Steve Jobs.

11 As Pixar went independent in 1986, Lucas explained his philosophy about how competition  
12 for computer engineers violated his sense of normalcy — and profit margins. According to court  
13 documents:

14 George Lucas believed that companies should not compete against each other for  
15 employees, because '[i]t's not normal industrial competitive situation.' As George Lucas explained,  
16 'I always — the rule we had, or the rule that I put down for everybody,' was that 'we cannot get into  
17 a bidding war with other companies because we don't have the margins for that sort of thing.'

18 Translated, Lucas' wage-reduction agreement meant that Lucasfilm and Pixar agreed to a)  
19 never cold call each other's employees; b) notify each other if making an offer to an employee of the  
20 other company, even if that employee applied for the job on his or her own without being recruited;  
21 c) any offer made would be "final" so as to avoid a costly bidding war that would drive up not just  
22 the employee's salary, but also drive up the pay scale of every other employee in the firm.

23 Jobs held to this agreement, and used it as the basis two decades later to suppress employee  
24 costs just as fierce competition was driving up tech engineers' wages.

25 The companies argued that the non-recruitment agreements had nothing to do with driving  
26 down wages. But the court ruled that there was "extensive documentary evidence" that the pacts  
27 were designed specifically to push down wages, and that they succeeded in doing so. The evidence  
28 includes software tools used by the companies to keep tabs on pay scales to ensure that within job

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1 "families" or titles, pay remained equitable within a margin of variation, and that as competition and  
2 recruitment boiled over in 2005, emails between executives and human resources departments  
3 complained about the pressure on wages caused by recruiters cold calling their employees, and  
4 bidding wars for key engineers.

5 Google, like the others, used a "salary algorithm" to ensure salaries remained within a tight  
6 band across like jobs. Although tech companies like to claim that talent and hard work are  
7 rewarded, in private, Google's "People Ops" department kept overall compensation essentially  
8 equitable by making sure that lower-paid employees who performed well got higher salary increases  
9 than higher-paid employees who also performed well.

10 As Intel's director of Compensation and Benefits bluntly summed up the Silicon Valley  
11 culture's official cant versus its actual practices,

12 While we pay lip service to meritocracy, we really believe more in treating everyone the  
13 same within broad bands.

14 The companies in the pact shared their salary data with each other in order to coordinate and  
15 keep down wages — something unimaginable had the firms not agreed to not compete for each  
16 other's employees. And they fired their own recruiters on just a phone call from a pact member  
17 CEO.

18 In 2007, when Jobs learned that Google tried recruiting one of Apple's employees, he  
19 forwarded the message to Eric Schmidt with a personal comment attached: "I would be very pleased  
20 if your recruiting department would stop doing this."

21 Within an hour, Google made a "public example" by "terminating" the recruiter in such a  
22 manner as to "(hopefully) prevent future occurrences."

23 Likewise, when Intel CEO Paul Otellini heard that Google was recruiting their tech staff, he  
24 sent a message to Eric Schmidt: "Eric, can you pls help here???"

25 The next day, Schmidt wrote back to Otellini: "If we find that a recruiter called into Intel,  
26 we will terminate the recruiter."

27 One of the reasons why non-recruitment works so well in artificially lowering workers'  
28 wages is that it deprives employees of information about the job market, particularly one as

1 competitive and overheating as Silicon Valley's in the mid-2000s. As the companies' own internal  
2 documents and statements showed, they generally considered cold-calling recruitment of "passive"  
3 talent — workers not necessarily looking for a job until enticed by a recruiter — to be the most  
4 important means of hiring the best employees.

5 Just before joining the wage-theft pact with Apple, Google's human resources executives are  
6 quoted sounding the alarm that they needed to "dramatically increase the engineering hiring rate"  
7 and that would require "drain[ing] competitors to accomplish this rate of hiring." One CEO who  
8 noticed Google's hiring spree was eBay CEO Meg Whitman, who in early 2005 called Eric Schmidt  
9 to complain, "Google is the talk of the Valley because [you] are driving up salaries across the  
10 board." Around this time, eBay entered an illegal wage-theft non-solicitation scheme of its own  
11 with Bill Campbell's Intuit, which is still being tried in ongoing federal and California state suits.

12 Google placed the highest premium on "passive" talent that they cold-called because  
13 "passively sourced candidates offer[ed] the highest yield," according to court documents. The  
14 reason is like the old Groucho Marx joke about not wanting to belong to a club that would let you  
15 join it — workers actively seeking a new employer were assumed to have something wrong with  
16 them; workers who weren't looking were assumed to be the kind of good happy talented workers  
17 that company poachers would want on their team.

18 For all of the high-minded talk of post-industrial technotopia and Silicon Valley as worker's  
19 paradise, what we see here in stark ugly detail is how the same old world scams and rules are still  
20 operative.

21 **Follow all of the Techtopus coverage [here](#).**

22 Article References

- 23 • Singer, Bill. ["After Apple, Google, Adobe, Intel, Pixar, And Intuit, Antitrust](#)  
24 [Employment Charges Hit eBay"](#). *Forbes*. Retrieved 2013-12-02.
- 25 • DOJ. ["Complaint, US v. Adobe Systems Inc., et al"](#) (PDF). DOJ. Retrieved 2013-12-  
26 02.
- 27 • ["Complaint, Hariharan v. Adobe Systems Inc., et al"](#) (PDF). Lieff, Cabraser,  
28 Heimann & Bernstein. Retrieved 2013-12-02.

Pg 934 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1       • ["Complaint, US v. Adobe Systems Inc., et al"](#) (PDF). Department of Justice.  
2       Retrieved 2013-12-02.
- 3       • Richey, Warren. ["Lucasfilm settles antitrust case over wage suppression of top](#)  
4       [animators"](#). The Christian Science Monitor. Retrieved 2013-12-02.
- 5       • ["Complaint, US v. Lucasfilm Ltd"](#). Department of Justice. Retrieved 2013-12-02.
- 6       • ["Justice Department Requires Six High Tech Companies to Stop Entering into](#)  
7       [Anticompetitive Employee Solicitation Agreements"](#) (Press release). United States  
8       Department of Justice. September 24, 2010. Retrieved 2016-01-14.
- 9       • ["U.S. v. Adobe Systems, Inc., et al.: Final Judgment"](#). United States Department of  
10       Justice. March 17, 2011. Retrieved 14 January 2016.
- 11       • ["Judge OKs class-action suit against Apple, Intel, Google, Adobe"](#). San Jose  
12       Mercury News. Retrieved 2013-12-02.
- 13       • Dan Levine (2014-04-24). ["Apple, Google agree to settle lawsuit alleging hiring](#)  
14       [conspiracy"](#). Chicago Tribune. Reuters. Retrieved 2016-01-17.
- 15       • Rosenblatt, Joel. ["Apple, Google Must Face Group Antitrust Hiring Lawsuit"](#).  
16       Bloomberg. Retrieved 2013-10-27.
- 17       • ["Judge Grants Class-Action Status in Silicon Valley Hiring Suit"](#). The Wall Street  
18       Journal. 2002-10-03. Retrieved 2013-10-27.
- 19       • ["Complaint, Hariharan v. Adobe Systems Inc., et al"](#) (PDF). Lieff, Cabraser,  
20       Heimann & Bernstein. Retrieved 2013-12-02.
- 21       • Cooley, Brian (2014-05-16). ["Judge approves first payout in antitrust wage-fixing](#)  
22       [lawsuit"](#). CNET. Retrieved 2016-01-17.
- 23       • ["Dockets & Filings: In re: High-Tech Employee Antitrust Litigation"](#). Justia.  
24       Retrieved 2013-12-02.
- 25       • Levine, Dan (2014-04-24). ["Apple, Google agree to settle lawsuit alleging hiring,](#)  
26       [salary conspiracy"](#). The Washington Post. Retrieved 2016-01-17.
- 27       • Levine, Dan (2014-04-24). ["Apple, Google agree to settle lawsuit alleging hiring](#)  
28       [conspiracy"](#). Reuters. Retrieved 2016-01-17.



Pg 935 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 • ["Apple, Google, Intel, Adobe Settle for \\$324.5 Million"](#). Bloomberg News. Retrieved  
2 2014-05-26.
- 3 • ["Judge questions settlement in Silicon Valley no-poaching case"](#). San Jose Mercury  
4 News. 2014-06-19. Retrieved 2016-01-17.
- 5 • ["Court Rejects Deal on Hiring in Silicon Valley"](#). The New York Times. 9 August  
6 2014.
- 7 • ["Judge Koh Sets April 2015 Trial In Tech Anti-Poach Row"](#). Retrieved 2015-01-13.  
8 22. [Court preliminarily approves \\$415m settlement of high-tech no-poaching lawsuit"](#).  
9 Retrieved 2015-06-30.

10 External links

- 11 • [Docket for US v. Adobe Systems Inc., et al. \(](#)  
12 <https://www.justice.gov/atr/cases/adobe.htm> )
- 13 • [Docket for US v. Lucasfilm Ltd. \(](#) <https://www.justice.gov/atr/cases/lucasfilm.html> )
- 14 • [The Silicon Valley Anti-Poaching Conspiracy \(](#)  
15 <https://web.archive.org/web/20150122225943/http://antitrust.buzz/anti-poaching/> )
- 16 • [Docket for In re: High-Tech Employee Antitrust Litigation \(](#)  
17 <http://dockets.justia.com/docket/california/candce/5:2011cv02509/243796/> )
- 18 • [Order Granting Plaintiffs' Supplemental Motion for Class Certification, In re High-](#)  
19 [Tech Employee Antitrust Litigation, no 11-CV-02509 \(N.D. Cal. Oct. 24, 2013\) \(](#)  
20 <https://www.scribd.com/doc/201651711/October-24-2013-Class-Cert-Order> )
- 21 • [High-Tech Employee Antitrust Litigation Settlement Administration Website \(](#)  
22 <http://www.hightechemployeeelawsuit.com/> )
- 23 • <http://pando.com/tag/techtopus/>
- 24 • \*[http://pando.com/2014/03/30/court-docs-google-hiked-wages-to-combat-hot-young-](http://pando.com/2014/03/30/court-docs-google-hiked-wages-to-combat-hot-young-facebook-after-sheryl-sandberg-refused-to-join-hiring-cartel/)  
25 [facebook-after-sheryl-sandberg-refused-to-join-hiring-cartel/](#)

26  
27 **THE LIES, CORRUPTION AND ANTI-TRUST VIOLATING INSIDER TRADING**  
28 **SCAMS AT THE DEPARTMENT OF ENERGY**

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1 Any voyage onto the path of funding from The U.S. Government will be a road to hell.

2 While frozen-smile aides will shake your hand and tell you how "*excited they are to*  
3 *welcome your application*", behind your back they are sharpening their knives.

4 Over 100 past Applicants were lied to, defrauded, stone-walled, bottom-drawer'd, sabotaged,  
5 and generally screwed with by **The U.S. Government** in order to: 1.) protect campaign financiers  
6 who were their competitors and 2.) stone-wall those Applicant's for being competitive against the  
7 Elon Musk and Solyndra chosen insiders.

8 Almost EVERY competing Applicant was faster, cheaper, had better MPG, was easier to  
9 manufacture, had lower cost to the main-stream market, had a better set of financials, had a better  
10 debt ratio, was safer, etc. but they missed one key factor: THEY DID NOT OFFER BRIBES AS  
11 LARGE AS ELON MUSK DID!

12 Even in 2020 you would have to be a sucker to apply for GOVT funds. There are people  
13 inside GOVT who are dedicated to making sure you never get that money. You can get a faster loan  
14 from a commercial bank without thousands of hidden "gotchas" and insider trading schemes to trip  
15 you up. These tricks, built into The U.S. Government process, are created to ensure that GOVT  
16 insiders have thousands of excuses to never let you get the money unless you agree to finance the  
17 correct political candidates.

18 Political insiders will always, though, find a way to disqualify any applicant who competes  
19 with campaign financier favorites. Hundreds of highly qualified applicants were denied because  
20 Elon Musk knew they could put Tesla out of business without GOVT's exclusive support of his  
21 monopoly. Tesla's own senior staff have written widely about the 'gate-keeper' insider trading scam  
22 at GOVT. GOVT is an anti-trust operator who is a gatekeeper of industry winners and losers based  
23 on who donated the most to certain PACs.

24 The Secretary of Energy and the Chief Counsel for the United States Department of Energy  
25 have been challenged, in writing, to provide the names of **ANY** Loan Programs Office (LPO) or  
26 Advanced Technology Vehicles Manufacturing (ATVM) Program official, reviewer, advisor or  
27 staffer who was not, from 2007 forward, either financed by, friends, with, sleeping with, dating the  
28 staff of, holding stock market assets in, promised a revolving door job or government service

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1 contracts from, partying with, personal friends with, photographed at private events with,  
2 exchanging emails with, business associates of or directed by; one of those business adversaries, or  
3 the Senators and Department of Energy politicians that those business adversaries pay campaign  
4 finances to, or supply political digital services to. From 2008 forward, The White House and The  
5 U.S. Government were controlled by the Silicon Valley tech oligarchs! That is a violation of the  
6 law, the Constitution and the American Way.

7 Department of Energy PR officials blindly push their revisionist history propaganda party-  
8 line hype that the GOVT has been "*fair and successful*". There has never been a bigger lie on Earth  
9 since the first frat boy told the first sorority girl "*don't worry, I won't get it in your mouth..*"

10 One group used CIA and FBI style investigation tools to hunt down every reviewer,  
11 contractor and insider involved in the Loan Programs Office (LPO) or Advanced Technology  
12 Vehicles Manufacturing (ATVM) Program since 2007. A forensic chart was produced showing the  
13 insider trading, revolving door and social engagements of each. In almost 97% of the cases, every  
14 person was found to have glaringly unethical, often criminal, conflicts of interest between  
15 beneficiary lines of connection.

16 In fact, multiple groups have insisted that the FBI, the NSA, The CIA and 60 Minutes  
17 conduct their own independent studies, on a name, by name basis of the GOVT staff involved and  
18 publish the results of that study to Congress and the public.

19 The U.S. Department of Energy has supplied no apologies, no compensation for damages to  
20 the victims and no halt in the slush-fund payola schemes!

21 Do you doubt the veracity of these claims? Show this letter to Bill Cooper, the head lawyer  
22 for GOVT. Ask him to provide forensic data proving any of these assertions are not true! He can't  
23 do it!

24 Plaintiffs can provide thousands of FBI agents, investigative journalists and Congressional  
25 staff to prove these assertions are true.

26 Dept. of Energy staff claim that they got rid of all of the bad people at GOVT and that the  
27 evil ones don't work there any more but OPM confirms that to be a lie. The stock market holdings,  
28 revolving door deals, voter records and social media postings of the current Dept of Energy staff

1 prove that the corrupt ones never left. Tell GOVT to take a look at their moral construct if they  
2 contact you!

3 See <http://www.majestic111.com> for more on this.

4 **Jay Carney** was Obama's "Hit Man" in the Oval Office at The White House during the  
5 Cleantech Crash. It was Carney who helped order character assassinations and hit jobs on members  
6 of the public who spoke out about the crimes. Carney was recently caught, again, ordering hit jobs  
7 at Amazon, as well. In a famous magazine interview, his home was revealed to be covered in  
8 communist propaganda posters.

9 Leaked notes from an internal meeting of Amazon leadership obtained by VICE News  
10 reveal company executives discussed a plan to smear fired warehouse employee Christian Smalls,  
11 calling him "not smart or articulate" as part of a PR strategy to make him "the face of the entire  
12 union/organizing movement."

13 "He's not smart, or articulate, and to the extent the press wants to focus on us versus him,  
14 we will be in a much stronger PR position than simply explaining for the umpteenth time how we're  
15 trying to protect workers," wrote Amazon General Counsel David Zapolsky in notes from the  
16 meeting forwarded widely in the company.

17 The discussion took place at a daily meeting, which included CEO Jeff Bezos, to update  
18 each other on the coronavirus situation. Amazon SVP of Global Corporate Affairs Jay Carney  
19 [described the purpose to CNN on Sunday](#): "We go over the update on what's happening around the  
20 world with Plaintiffs employees and with Plaintiffs customers and Plaintiffs businesses. We also  
21 spend a significant amount of time just brainstorming about what else we can do" about COVID-19.

22 ( [https://www.cnn.com/videos/business/2020/03/29/is-amazon-doing-enough-to-protect-](https://www.cnn.com/videos/business/2020/03/29/is-amazon-doing-enough-to-protect-workers-and-customers.cnn)  
23 [workers-and-customers.cnn](https://www.cnn.com/videos/business/2020/03/29/is-amazon-doing-enough-to-protect-workers-and-customers.cnn) )

24 Amazon [fired the warehouse worker Smalls](#), after he led a walkout of a number of  
25 employees at a Staten Island distribution warehouse. Amazon says he was fired for violating a  
26 company-imposed 14-day quarantine after he came into contact with an employee who tested  
27 positive for the coronavirus.

28 ( [https://www.vice.com/en\\_us/article/5dmea3/amazon-fired-the-warehouse-worker-who-](https://www.vice.com/en_us/article/5dmea3/amazon-fired-the-warehouse-worker-who-)

1 [organized-a-walkout-over-coronavirus](#) )

2 Zapolsky's notes from the meeting detail Amazon's plan to deal with a wave of bad press  
3 and calls for investigations from elected officials following the firing of Smalls. They also show top  
4 Amazon brass wanted to make Smalls the focus of its narrative when questioned about worker  
5 safety.

6 "We should spend the first part of Plaintiffs response strongly laying out the case for why  
7 the organizer's conduct was immoral, unacceptable, and arguably illegal, in detail, and only then  
8 follow with Plaintiffs usual talking points about worker safety," Zapolsky wrote. "Make him the  
9 most interesting part of the story, and if possible make him the face of the entire union/organizing  
10 movement."

11 They discussed encouraging Amazon executives to use Smalls to discredit the wider labor  
12 movement at Amazon. Employees at the warehouse, known as JFK8, [launched an effort to unionize](#)  
13 [in 2018](#).

14 ( [https://www.bloomberg.com/news/articles/2018-12-12/employees-at-amazon-s-new-nyc-](https://www.bloomberg.com/news/articles/2018-12-12/employees-at-amazon-s-new-nyc-warehouse-launch-unionization-push)  
15 [warehouse-launch-unionization-push](#) )

16 In his notes, Zapolsky wrote that there was "general agreement" on this point among the  
17 other attendees of the meeting. (Zapolsky's notes also mention SVP of worldwide operations and  
18 customer service Dave Clark and SVP of human resources Beth Galetti.) This is the typical culture  
19 of the Obama crowd of insider executives who will destroy any citizen who gets in their way. Jay  
20 Carney runs a ***Massive covert organized corruption team at Amazon in order to manipulate***  
21 ***Democracy***.

22 Examples of these groups include Pacronym and American Bridge who are part of Arabella  
23 Advisors, a consulting firm that is not required to identify its donors.

24 Pacronym's affiliated groups create a large network of fake local news outlets that are  
25 designed to promote progressive viewpoints inside battleground states in order to rig insider trading  
26 for their top bosses.

27 They are all part of a wealthy dark money network that manipulates public policy for  
28 personal profiteering.

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American Bridge 21st Century and Pacronym are cutting ads thrashing outsiders as super PACs who go after people they don't like, The Washington Post [reported](#). Both groups also have ties to two fake false-front large nonprofit groups — New Venture Fund and Sixteen Thirty Fund — connected to a massive extreme-leaning consulting group.

( [https://www.washingtonpost.com/politics/democratic-groups-to-spend-millions-hitting-trump-over-coronavirus-response/2020/03/17/5f9fadba-686c-11ea-9923-57073adce27c\\_story.html](https://www.washingtonpost.com/politics/democratic-groups-to-spend-millions-hitting-trump-over-coronavirus-response/2020/03/17/5f9fadba-686c-11ea-9923-57073adce27c_story.html) )

NVF gave one of Pacronym's nonprofits — ACRONYM — \$250,000 while providing American Bridge \$40,000 in 2018, [according to](#) NVF's 2018 IRS documents. IRS [records](#) also indicated American Bridge pulled in \$200,000 in 2018 from nonprofit Sixteen Thirty Fund, which reportedly spent \$141 million on various extreme-leaning causes during the midterm election year.

( [https://apps.irs.gov/pub/epostcard/cor/205806345\\_201812\\_990\\_2020013117095977.pdf](https://apps.irs.gov/pub/epostcard/cor/205806345_201812_990_2020013117095977.pdf) )  
( <https://static.politico.com/4b/32/19c3670b41dfa1f8c1b3e0972138/2018-1630-form990.pdf> )

Sixteen Thirty Fund and nonprofit NVF are tied into the same sprawling network, according to an analysis by investigators. Arabella Advisors, a philanthropic consulting company based in Washington, D.C., manages four nonprofits, including the [NVF](#), Sixteen Thirty Fund, Hopewell Fund and the Windward Fund.

( <https://www.influencewatch.org/non-profit/new-venture-fund/> )

Sixteen Thirty Fund has not responded to requests for comment, while NVF acknowledged making a grant to ACRONYM in 2018 but noted that it “has nothing to do with the activities at PACRONYM or American Bridge.”

Arabella representative Steve Sampson called NVF merely a “client of ours,” even though the consulting group shares a Washington, D.C., office with all four groups, according to NVF and Sixteen Thirty Fund's 2018 IRS records. American Bridge has not responded to requests for comment.

Other groups have raised alarms about the network as well.

“Arabella Network is the umbrella, and they have these two funds that flow toward both of these groups. A clearly full-blown extremist arm that is casting itself as a nonprofit is politicizing

1 this event,” former Nevada Attorney General Adam Laxalt told the press.

2 Laxalt is the Outside Counsel to Americans for Public Trust, a group dedicated to  
3 uncovering unethical behavior. Americans for Public Trust has [covered](#) the network in the past.

4 **(RELATED: Billionaire Allegedly Behind A False Flag Operation In Alabama Helped**  
5 **Finance The Group Behind Iowa Caucus Chaos)**

6 ( <https://dailycaller.com/2020/02/18/acronym-iowa-caucus-barack-obama/> )

7 “American lives are more important than scoring cheap political points,” he added after  
8 suggesting that the group is striking while the iron is hot and making certain they capitalize on a  
9 crisis that has so far killed thousands of people.

10 Laxalt is referring to Pacronym’s [announcement](#) on March 17 to plow \$5 million into a  
11 digital advertising campaign railing against those they hate. The ads are published through Four is  
12 Enough, a Pacronym project.

13 ( [https://www.washingtonpost.com/politics/democratic-groups-to-spend-millions-hitting-](https://www.washingtonpost.com/politics/democratic-groups-to-spend-millions-hitting-trump-over-coronavirus-response/2020/03/17/5f9fadba-686c-11ea-9923-57073adce27c_story.html)  
14 [trump-over-coronavirus-response/2020/03/17/5f9fadba-686c-11ea-9923-57073adce27c\\_story.html](https://www.washingtonpost.com/politics/democratic-groups-to-spend-millions-hitting-trump-over-coronavirus-response/2020/03/17/5f9fadba-686c-11ea-9923-57073adce27c_story.html) )

15 ACRONYM’s founder said the campaign makes sense from a public health and national  
16 security perspective.

17 Democratic operative David Plouffe another Jay Carney-type "hit-man", who managed  
18 former President Barack Obama’s 2008 White House bid, sits alongside McGowan on  
19 ACRONYM’s board.

20 ACRONYM has not responded to the DCNF’s repeated requests for comment.

21 **(RELATED: Tech Firm Behind Iowa Caucus Disaster Also Played Role In Creating A Covert**  
22 **Democratic Propaganda Media Outfit)**

23 ( <https://dailycaller.com/2020/02/04/iowa-caucus-shadow-buttigieg/> )

24 Some academics argued that orchestrating such a campaign skirts ethical rules. Running  
25 advertisements thrashing the president during a health crisis looks bad, according to Daniel Kreiss,  
26 a professor of political communication at the University of North Carolina at Chapel Hill.

27 “It’s a very fine line between ensuring that the president has the legitimacy to speak  
28 authoritatively on what Americans must do in order to be safe, and the very real and legitimate

1 questions to raise regarding how the president has handled this crisis given that he's on the ballot in  
2 November," Kreiss told WaPo in a March 17 report addressing the ad campaign push.

3 ( [https://www.washingtonpost.com/politics/democratic-groups-to-spend-millions-hitting-](https://www.washingtonpost.com/politics/democratic-groups-to-spend-millions-hitting-trump-over-coronavirus-response/2020/03/17/5f9fadba-686c-11ea-9923-57073adce27c_story.html)  
4 [trump-over-coronavirus-response/2020/03/17/5f9fadba-686c-11ea-9923-57073adce27c\\_story.html](https://www.washingtonpost.com/politics/democratic-groups-to-spend-millions-hitting-trump-over-coronavirus-response/2020/03/17/5f9fadba-686c-11ea-9923-57073adce27c_story.html) )

5 Laxalt, Nevada's former attorney general, expressed a similar position.

6 "The timing of attacking the president in battleground states is appalling. If they are going to  
7 do it, then you name the place. I think that doing it right this second is outrageous," he told the  
8 DCNF.

9 Meanwhile, ACRONYM's McGowan is also creating a constellation of local news websites  
10 that act as progressive arms targeting the president and his policies.

11 McGowan, a digital producer for Obama for America in 2011 and the proprietor behind  
12 ACRONYM, raised at least \$25 million from wealthy liberals to create a media company called  
13 Courier Newsroom that is designed to deliver information favorable to Democrats. Courier is  
14 rolling out newspapers in swing states to counter what its founder believes is right-wing spin on  
15 Facebook and across the digital domain.

16 ( <https://www.linkedin.com/in/taramcgowan/> )

17 ( <https://dailycaller.com/2019/11/05/obama-trump-elections-ads-digital/> )

18 ( <https://couriernewsroom.com/> )

19 Along with the Courier Newsroom, McGowan is reportedly creating Virginia Dogwood and  
20 Arizona's Copper Courier, among others that are expected to roll out in Michigan, North Carolina,  
21 Pennsylvania, Virginia and Wisconsin, all battleground states.

22 **Mind the Gap** at Stanford University is an even sneakier covert group from this crowd.  
23 Their efforts haven't previously been reported. They recently petitioned some donors for at least  
24 \$100,000 to support its efforts. Backers include people like Facebook co-founder Dustin Moskovitz,  
25 former Google CEO Eric Schmidt, San Francisco power broker Ron Conway, and a coterie of major  
26 Democratic donors from across Silicon Valley, including fundraiser Amy Rao. What is also unusual  
27 is that Mind the Gap is led not by highly experienced political hands, but by academics with no  
28 professional backgrounds as fundraisers. The group's leaders are a pair of Stanford law professors:



1 [Barbara Fried](#), who has no apparent campaign experience, and [Paul Brest](#), the former president of  
 2 the William and Flora Hewlett Foundation. [Graham Gottlieb](#), a Stanford fellow who served in  
 3 junior roles for former President Barack Obama's 2012 reelection campaign and in his White  
 4 House, is its executive director.

5 ( <https://www.cnn.com/2016/09/09/politics/facebook-cofounder-gift-democrats/index.html> )

6 ( <https://law.stanford.edu/directory/barbara-fried/> )

7 ( <https://law.stanford.edu/directory/paul-brest/> )

8 ( <https://casbs.stanford.edu/people/graham-gottlieb> )


9 While dressed in khaki's and acting like they are "saving the trees", the people behind these  
 10 groups are cold-blooded mercenaries drunk on power, hookers, private jets and a sense of being  
 11 above-the-law.

#### 12 [A Corrupt Politician They Didn't ...](#)

13  <https://newswithviews.com/democrats-havent-seen-a-corrupt-politician-they-didnt-like/>

14 Overcoming the specter of a roiling federal **corruption** probe that threatened to draw the  
 15 curtain on his 16-year career on Capitol Hill, ... Secretary of Energy **Steven Chu**, and UN  
 16 Ambassador Susan Rice were all among the top ten most corrupt politicians in Washington for  
 17 2012, ...

#### 19 [OBAMA SCAM: Who are the main VIP cartel members targeted ...](#)

20  [themillenniumreport.com/2018/02/obama-scam-who-are-the-main-vip-cartel-members-](https://themillenniumreport.com/2018/02/obama-scam-who-are-the-main-vip-cartel-members-targeted-for-takedown/)  
 21 [targeted-for-takedown/](https://themillenniumreport.com/2018/02/obama-scam-who-are-the-main-vip-cartel-members-targeted-for-takedown/)

22 OBAMA SCAM: Who are the main VIP cartel members targeted for takedown? The Crooks

#### 24 [Is Elon Musk A Fraud?](#)

25  [https://xyzcase.weebly.com/uploads/1/4/4/1/14419908/is\\_elon\\_musk\\_a\\_fraud\\_.pdf](https://xyzcase.weebly.com/uploads/1/4/4/1/14419908/is_elon_musk_a_fraud_.pdf)

26 "Elon Musk is a criminal and a racketeer" Op-Ed- By Lee Van Steiner If you hear that  
 27 phrase and you suddenly turn your brain off and think to yourself: "I don't want to hear that  
 28 because, either; A.)

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**Ripoff Report > Washington, District of Columbia**

<https://www.ripoffreport.com/reports/united-states-department-of-energy/washington-district-of-columbia-20585/united-states-department-of-energy-steven-chu-kathy-zoi-lachlan-seward-matt-rogers-st-1412021>

United States Department of Energy **Steven Chu**, Kathy Zoi, Lachlan Seward, Matt Rogers, Steve Spinner, They defrauded over 100 companies and individuals in a crony payola

**Steven Chu Should Lose His Job Over The Solyndra Scandal ...**

<https://www.investors.com/politics/editorials/steven-chu-should-step-down-after-solyndra-scandal/>

In testimony Thursday before the House Energy and Commerce Committee, **Steven Chu**, caught in a tangled web of administration deceit regarding a \$535 million guaranteed loan to Solyndra, tried but ...

## EXHIBIT 40 – General Overview Of The Corruption Scheme

A crime involving stock market securities insider-trading, contracts, bribes and famous politicians occurred. Plaintiffs saw it, were invited in to it, and reported it and now a cover-up is being operated.

### EXPANDED CAPSULE OVERVIEW:

Department of Energy Staff (ie: Chu, Zoi, Seward, Cohen, etc.), White House Staff (ie: Emanuel, Axelrod, Carney, Plouffe, Gibbs, etc.), CIA staff (ie: Panetta, Woolsey) owned the rare earth (ie: lithium, indium, cobalt) mining scam stock (ie: Goldman Sachs & JP Morgan transfers) market securities from foreign countries (ie: Afghanistan, Congo, etc.) which only benefited themselves, Elon Musk and his Silicon Valley Cartel (ie: Page, Cohen, Schmidt, Westly, Khosla, Spinner, Hoffman, etc.). They ran hit-jobs and anti-trust schemes against competitors and whistle-blowers using a racketeering operation structure. They run corporate escort rings, lobbyist bribe PACs, money laundering and tax evasion joint operations and character assassination media cartels.

### MORE DETAILED OVERVIEW:

- Famous political figures use the trillions of dollars in government treasuries and the stock market for illicit profiteering by rigging the system exclusively for themselves and their crony insiders.

- They attacked us using government taxpayer funded media (*Fusion GPS, Black Cube, Google, Pysops, Gizmodo, Media Matters, Blumenthal, etc.*) and spy agency tools because we competed with their businesses and reported their crimes.

- San Francisco Bay Area government has as many corrupt politicians as Chicago and relies on the same RICO-violating insider corruption network to operate; as proven by deep AI searches of their financial records. Arrests of those officials is now underway.

- Silicon Valley law enforcement records prove that these tech oligarchs engage in an

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1 organized, racketeering-based, massive sex trafficking, tax evasion, anti-trust violating, spousal  
2 abuse, money laundering, black-listing, racist, ageist, political bribery, crony racketeering crime  
3 Cartel.

4 - Famous U.S. Senators, Governors and their staff knowingly engage in, finance, operate  
5 and benefit from these crimes in exchange for search engine manipulation and stock market assets.

6 - Silicon Valley and Hollywood media companies censor and cover-up news coverage of  
7 these crimes because they have a financial connection to the perpetrators.

8  
9 - [Most of the government officials working on Plaintiffs case were hand-picked by Plaintiffs](#)  
10 [business adversaries.](#)

11 ( [http://american-corruption.com/EXPOSE\\_THE\\_MOBSTERS.html](http://american-corruption.com/EXPOSE_THE_MOBSTERS.html) )

12 Plaintiffs case has never been fairly reviewed by non-biased, non-conflicted officials.  
13 Plaintiffs FBI-class associates have not found a single entity in Plaintiffs case reviews, or  
14 determinations, who was not either: financed by, friends, with, sleeping with, dating the staff of,  
15 holding stock market assets in, promised a revolving door job or government service contracts from,  
16 partying with, personal friends with, photographed at private events with, exchanging emails with,  
17 business associates of or directed by; one of those business adversaries, or the Senators and  
18 politicians that those business adversaries pay campaign finances to, or supply political digital  
19 services to.

20  
21  
22 Who are the criminal mobsters of Silicon Valley's democracy manipulation millionaires and  
23 billionaires? Who are the elitist tax evader, sex freak, money-laundering, Senator bribing, off-shore  
24 cash hiding, election rigging insiders who try to rig the system for their own insider trading  
25 schemes: **Reid Hoffman, Larry Page, Sergy Brin, Elon Musk, Dustin Moskovitz, Mark**  
26 **Zuckerberg, Eric Schmidt, Laurene Powell Jobs, Steve Spinner, Steve Westly, Vinod Khosla,**  
27 **Andy Bechtolsheim, Brian Goncher, Cheryl Sandberg, David Drummond, Andy Rubin, David**  
28 **Plouffe, Tim Draper, Jeffrey Epstein, Gilman Louie, Ira Ehrenpreis, Tim Cook, Jerry Brown,**

1 **Richard Blum, James Breyer, John Podesta, Joe Lonsdale, John Doerr, Keith Rabois, Marc**  
2 **Andreesen, George Soros, Mario Rosatti, Martin LaGod, Michael Moritz, Viktor Vekselberg,**  
3 **Larry Summers, Pierre Omidyar, Tom Steyer, Steve Jurvetson, Steve Rattner and their**  
4 **CARTEL! They have "command and control and exclusive beneficiary positions in ongoing,**  
5 **coordinated, criminal and anti-trust activities involving government and stock market funds..."**

6  
7 They hire these dirty law firms, investment bankers, lobbyists, fake charity fronts and character  
8 assassination services to do their dirty work. Their contractors and employees pay the bribes, relay  
9 the orders, buy the 'reporters', implement their black-lists, source the hookers and do the day-to-day  
10 illicit deeds.

11 These are the people funding and promoting riots across the US and Europe.  
12 [LinkedIn Co-Founder Reid Hoffman](#), who [notoriously backed](#) a group that "spread  
13 disinformation during the 2017 Alabama special election for U.S. Senate," is now being joined by  
14 other Big Tech billionaires in a plot to boost presumptive Democratic nominee for president Joe  
15 Biden in 2020.

16 ( <https://www.forbes.com/profile/reid-hoffman/#3e47244a1849> )  
17 ( [https://www.newsbusters.org/blogs/techwatch/corinne-weaver/2019/04/23/lefty-](https://www.newsbusters.org/blogs/techwatch/corinne-weaver/2019/04/23/lefty-billionaires-election-plot-bought-56x-more-ads)  
18 [billionaires-election-plot-bought-56x-more-ads](https://www.newsbusters.org/blogs/techwatch/corinne-weaver/2019/04/23/lefty-billionaires-election-plot-bought-56x-more-ads) )

19 Democrats are "scrambling to patch [Biden's] digital deficits," according to [Vox Recode](#).  
20 "[B]ehind the scenes, Silicon Valley's billionaire Democrats **are spending tens of millions of**  
21 **dollars on their own sweeping plans** to catch up to President Donald Trump's lead on digital  
22 campaigning." [Emphasis added.] Recode said these "sweeping plans" are "poised to make [these  
23 billionaires] some of the country's most influential people when it comes to shaping the November  
24 results."

25 These billionaires in particular are funding everything from "nerdy political science  
26 experiments to divisive partisan news sites to rivalrous attempts to overhaul the party's beleaguered  
27 data file."

28 As Recode tells it, "Joe Biden has a problem. Silicon Valley billionaires think they have a

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1 solution.”

2 Recode identified four major players from Big Tech that have the “most ambitious plans”:  
3 Reid Hoffman, Facebook co-founder [Dustin Moskovitz](#), philanthropist [Laurene Powell Jobs](#), and  
4 former Google CEO [Eric Schmidt](#).

5 ( <https://www.forbes.com/profile/dustin-moskovitz/#7ca9684d1dd3> )

6 ( <https://www.forbes.com/profile/laurene-powell-jobs/#436a3ff5704f> )

7 ( <https://www.forbes.com/profile/eric-schmidt/#569af27c138e> )

8 Hoffman, in particular, stands out from the rest. [OpenSecrets](#) revealed that “political  
9 operations are pouring millions of ‘dark money’ dollars into ads and digital content masquerading  
10 as news coverage to influence the 2020 election.”

11 ( <https://www.opensecrets.org/news/2020/05/dark-money-networks-fake-news-sites/> )

12 One of those progressive [operations](#) is dubbed Courier Newsroom, which “has faced  
13 scrutiny for exploiting the collapse of local journalism to spread ‘[hyperlocal partisan propaganda](#).’”  
14 Courier Newsroom is owned by the leftist nonprofit ACRONYM.

15 ( [https://www.newsbusters.org/blogs/business/joseph-vazquez/2020/05/26/lefty-dark-](https://www.newsbusters.org/blogs/business/joseph-vazquez/2020/05/26/lefty-dark-money-group-acronym-behind-liberal-fake-news)  
16 [money-group-acronym-behind-liberal-fake-news](https://www.newsbusters.org/blogs/business/joseph-vazquez/2020/05/26/lefty-dark-money-group-acronym-behind-liberal-fake-news) )

17 ( [https://www.washingtonpost.com/opinions/2020/02/06/is-it-local-journalism-or-just-local-](https://www.washingtonpost.com/opinions/2020/02/06/is-it-local-journalism-or-just-local-propaganda/)  
18 [propaganda/](https://www.washingtonpost.com/opinions/2020/02/06/is-it-local-journalism-or-just-local-propaganda/) )

19 OpenSecrets reported that ACRONYM had “received [financial backing](#) from [Investing in](#)  
20 [US](#), an investment vehicle funded by Silicon Valley donor and billionaire LinkedIn founder Reid  
21 Hoffman.” Recode said that Hoffman’s “aides have indicated that setting up partisan news sites that  
22 masquerade as journalism is one of the priorities of its group of allied donors.” According to  
23 Recode, Hoffman has put around \$10 million into ACRONYM.

24 ( [https://www.politico.com/news/2020/02/05/angry-democrats-unload-operative-over-iowa-](https://www.politico.com/news/2020/02/05/angry-democrats-unload-operative-over-iowa-caucus-results-110807)  
25 [caucus-results-110807](https://www.politico.com/news/2020/02/05/angry-democrats-unload-operative-over-iowa-caucus-results-110807) )

26 ( [https://mronline.org/2020/02/07/acronym-group-that-sabotaged-iowa-caucus-birthed-by-](https://mronline.org/2020/02/07/acronym-group-that-sabotaged-iowa-caucus-birthed-by-billionaire-who-funded-alabama-disinformation-campaign/)  
27 [billionaire-who-funded-alabama-disinformation-campaign/](https://mronline.org/2020/02/07/acronym-group-that-sabotaged-iowa-caucus-birthed-by-billionaire-who-funded-alabama-disinformation-campaign/) )

28 But that isn’t all Hoffman has been up to. Recode reported that Hoffman invested “\$18

1 million, his single-biggest bet this cycle,” in a political startup called Alloy.

2 Recode reported that “[t]he startup is attempting to build a warehouse to store the data that  
3 various progressive groups collect on voters and use it to try to get them to the polls.” Recode  
4 continued: “As part of its data acquisition, Alloy has bought some lists of voters’ cellphone  
5 numbers, a data source that people say Hoffman’s team, like other donors, sees as key this year due  
6 to the new need for digital campaigning.”

7 The former [Google CEO Eric Schmidt](#) is also getting heavily involved this cycle. Recode  
8 said Schmidt “has sunk money into the Democratic Data Exchange, a modest, competing effort by  
9 the Democratic National Committee to encourage data sharing by state parties to improve the  
10 party’s beleaguered digital backbone.” Recode interestingly assessed that Schmidt “may be working  
11 more closely with the party than Hoffman.”

12 ( <https://ericschmidt.com/bio/> )

13 Schmidt also had [reportedly](#) given a \$4.7 million gift to the taxpayer-funded liberal outlet  
14 National Public Radio with his wife Wendy.

15 ( [https://www.newsbusters.org/blogs/business/joseph-vazquez/2020/05/20/npr-editor-lauds-](https://www.newsbusters.org/blogs/business/joseph-vazquez/2020/05/20/npr-editor-lauds-npr-landing-47m-contribution-dem-donor)  
16 [npr-landing-47m-contribution-dem-donor](https://www.newsbusters.org/blogs/business/joseph-vazquez/2020/05/20/npr-editor-lauds-npr-landing-47m-contribution-dem-donor) )

17 “This focus on ‘information distribution’ has also led many Silicon Valley donors, directly  
18 or indirectly, to fund projects like [Pulso](#) and [PushBlack](#), which are quasi-journalistic plays focused  
19 on the Hispanic and African American communities, respectively,” Recode said. “Two things both  
20 Pulso and PushBlack also do? Register voters who are likely to be Democrats.”

21 ( <https://projectpulso.org/> )

22 ( <https://pushblack.org/> )

23 Tech billionaires, “particularly Moskovitz and Powell Jobs,” are unleashing “millions into  
24 some of the country’s most ambitious voter-registration programs — **almost all of it behind the**  
25 **scenes** — hoping to emulate what worked for Democrats in 2018,” according to Recode. [Emphasis  
26 added.]

27 About a dozen voter-registration groups, which included failed Democratic Georgia  
28 gubernatorial candidate Stacey Abrams’s leftist group [Fair Fight](#), gathered at Powell Jobs’s

1 “Emerson Collective headquarters in mid-March to raise money for their 2020 plans, sources told  
2 Recode.”

3 ( <https://fairfight.com/about-fair-fight/> )

4 For Moskovitz, his “North Star is a desire to nail the lowest ‘cost-per-net-Democratic-  
5 vote.’” Recode said “[t]hat’s largely led his team toward the funding of mail and voter-registration  
6 work.”

7 As [Big Tech platform Twitter](#) dips into editorializing Trump’s tweets, it appears that other  
8 billionaire liberals from Silicon Valley are not going to be sitting idly by for a repeat of the 2016  
9 election outcome.

10 ( [https://www.newsbusters.org/blogs/techwatch/alexander-hall/2020/05/27/liberal-media-  
11 back-twitter-fact-checking-trump-voter-fraud](https://www.newsbusters.org/blogs/techwatch/alexander-hall/2020/05/27/liberal-media-back-twitter-fact-checking-trump-voter-fraud) )

12 These people operate like a private Mafia that use Plaintiffs government as their plaything!

13 **Recap:**

14 *The Silicon Valley tech Cartel (AKA: "Paypal Mafia", "Deep State") is evil because these racist,*  
15 *ageist, sex-trafficking, money-laundering, elitist, politician bribing, tax evaders: steal any*  
16 *technology they desire; They manufactured the CLEANTECH CRASH as shown in the 60*  
17 *MINUTES episode of the same name; they run a prostitution ring and sexually extort young women*  
18 *and interns in Silicon Valley; they are 'rape culture' take-what-they-want misogynists, ageists and*  
19 *racists as their history of abuses has proven; their Palo Alto Cartel operates AngelGate-type*  
20 *collusion and stock market insider trading schemes that harm independent business and the public;*  
21 *their Cartel ran the "no poaching" CEO ring which was class-action sued by DOJ and tech*  
22 *workers; 90% of their divorce court files reveal horrific abuses and sex trafficking;*  
23

24  
25  
26 *They have an army of lobbyists that pay cash, stock market and revolving door bribes to U.S.*  
27 *Senators; They can even evade FBI & SEC investigations; They hire women to act as 'trophy wives'*  
28 *and 'beards'; they have lobbyists rig the U.S. Patent Office in order to block inventor patent rights*



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1 because they are using stolen technologies; they have been caught on video and recordings beating,  
2 kicking and harming women hundreds of times;

3  
4 They have bought up all of the Tier-One tech law firms and order them to black-list, and never help,  
5 those who seek equal tech rights; they collude to abuse your privacy and make databases on the  
6 public for political control; they have to cheat to compete because they are only good with spread  
7 sheets instead of innovation; They run black-lists, character assassination attacks, collusion and  
8 other anti-trust violating acts in violation of RICO laws. Silicon Valley has become the largest  
9 assemblage of douche-bags and yuppie frat boy criminals in human history.

10  
11 Theranos is not the exception, it is the standard. Tesla, Google, Theranos, Wework, Facebook are  
12 lies backed by famous political insiders to protect their insider trading and covered-up by fake news  
13 operators. They are also fronts to fund political campaigns via the ill-gotten profits from their  
14 endeavors. When the bad guys, and their lap-dog politicians, attack you because your products are  
15 better than theirs they are proving that they are frat boy scumbags, from Stanford and Yale, that  
16 operate in a little pack, like dogs!

17  
18  
19 Their Sandhill Road operation should be raided by the FBI! The best thing that could come from the  
20 COVID pandemic is that they all are forced into bankruptcy! When your Senator holds stock market  
21 shares in companies that exist to profit on the backs of consumers, via corruption, then it is  
22 impossible for that Senator to ever do anything but be corrupt! We have reported this in writing to  
23 winklerm@sec.gov, sanfrancisco@sec.gov and 30+ other federal officers but have yet to see  
24 Plaintiffs whistle-blower rewards...or any action!

25  
26  
27 Do you wonder how big politician insider stock trading is? Take a look at how many TRILLIONS of  
28 dollars pass through the stock markets annually and then look at the reported, AND

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1 UNREPORTED, securities holdings of famous U.S. Senators and government agency staff. That is  
2 what Seth Rich and the people in the "In Memory Of" section, below, were disclosing. These are  
3 massive crimes! The perpetrators operate a massive and abusive national sex cult. The perverts in  
4 the SandHill Road Venture Capital offices, located between Highway 280 down to Santa Cruz  
5 Avenue on Sand Hill Road in Menlo Park, California, are the main perpetrators of this global  
6 cartel. Their executives at Google, Facebook, Netflix, Linkedin, Twitter, and their related holdings,  
7 comprise the rest. The Harvey Weinstein and Ed Buck sex scandals are well known.  
8

9  
10 These men's sex cult actions have been widely covered in the news individually in the Joe Lonsdale  
11 rape case, The Kleiner Perkins Ellen Pao sex abuse lawsuit, The Eric Schmidt sex penthouse  
12 stories, The Jeffrey Epstein case, The Google Forrest Hayes hooker murder case, The Andy Rubin  
13 sex slave case, The Sergy Brin 3-way sex romp scandal, The British Hydrant investigation, The  
14 Elon Musk Steve Jurvetson billionaire sex parties scandals, The NXIVM sexual slave cases, The  
15 Michael Goguen anal sex slave trial, The Tom Perkins Hooker Parties and thousands of other cases  
16 and federal divorce court filings. This group of people have proven themselves, over and over, to be  
17 sociopath control freaks not fit for participation in public commerce, public policy or media  
18 control. The Four Seasons Hotel and Rosewood Hotels in Silicon Valley are estimated to engage in  
19 over \$30,000.00 of high-end escort sex trafficking per day, a portion of it managed by Eastern Bloc  
20 Mafia operators. The Elon Musk sex perversions are the tip of the iceberg.  
21

22  
23  
24 At least 10 Ukrainian escorts fly in and out of SFO and SJO airports every week for these Cartel  
25 members. Google boss David Drummond engaged in horrible philandering sexual violations of his  
26 wife yet Google covers up every story about it on the web. Google's Eric Schmidt is under massive  
27 investigation. You hear about the female victims of this sex cult but you rarely hear about the young  
28 male victims. One of their vast numbers of prostitutes is quoted as saying that the girls and boys are

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1 paid "not just for sex but for the oligarch's endless need to feel that they can control anyone for any  
2 reason...". Multiple attorney general's controlled by their cartel, ie: Eric Schneiderman and Eliot  
3 Spitzer, are involved this these sex rings.

4  
5 These are the main influencers of a national political party and they are all involved in horrific sex  
6 perversions and abuses! All Silicon Valley tech cartel media companies work together to censor all  
7 news and information in order to hide coverage of their dirty deeds and to only put politicians in  
8 office that will give the Cartel political payola, kick-backs and insider stock pumps.  
9

10  
11 The Smedley Butler "Business Plot" from the past is not unlike the coup that Google and clan tried.  
12 See details in Emily Chang's book: BROTOPIA; Roan Farrow's book: CATCH & KILL; Edward  
13 Snowden's Book: PERMANENT RECORD; Peter Schwetzer's book: THROW THEM ALL OUT;  
14 Dave Eggers book: THE CIRCLE; Franklin Foer's book: WORLD WITHOUT MIND; Corey Pein's  
15 book: JOURNEY INTO THE SAVAGE HEART OF SILICON VALLEY; Dan Lyon's book:  
16 DISRUPTED; Antonio Martinez book: CHAOS MONKEYS. The Angelgate, Epstein, No-Poaching  
17 DOJ Class Action, and hundreds of other cases, prove that they meet, conspire, collude and  
18 blacklist in felony violation of anti-trust and RICO Racketeering laws. -  
19

20  
21 90% of these guys came from 100% of the fraternity houses involved in the recent college rape  
22 cases.  
23  
24  
25  
26  
27  
28

## EXHIBIT 41- The Quid Pro Quo Process

### How California Politicians And Silicon Valley Tech Company Quid-Pro-Quo Works To Hide The Criminality of Corruption

*Christine Lakatos* massive investigations of Jerry Brown, Dianne Feinstein, Nancy Pelosi, Kamala Harris and other famous California politicians owning parts of Tesla Motors, Facebook, Google, Netflix and Cleantech is jaw dropping. All of those politicians competing constituents have suffered for it, or been put out of business by exclusive deals that only Tesla Motors, Facebook, Google, Netflix and YouTube got. That is a crime!

A large volume of forensic research proves that Silicon Valley Cartel tech firms receive benefits from politicians and politicians, at the same time, benefit from these firms.

This evidence on the exchange of benefits between politicians and firms implies some sort of agreement between these two parties. This agreement, however, cannot be in the form of a written contract as writing direct fee-for-service contracts between a politician and a firm is considered bribery (Kroznor and Stratmann 1998; 2000). In addition, either party to this agreement might renege on its promise and the other party cannot resort to the courts.

Procon.org, for example, reports: “Less than two months after ascending to the United States Senate, Barack Obama bought more than \$50,000 worth of stock in two speculative companies whose major investors included some of his biggest political donors. One of the companies was a biotech concern that was starting to develop a drug to treat avian flu. In March 2005, two weeks after buying about \$5,000 of its shares, Mr. Obama took the lead in a legislative push for more federal spending to battle the disease. The most recent financial disclosure form for Mr. Obama . . . shows that he bought more than \$50,000 in stock in a satellite communications business whose principal backers . . . had raised more than \$150,000 for his political committees.” ( <http://insidertrading.procon.org/viewresource.asp?resourceID=1580#obamaa>. See more examples from the Citizens for Responsibility and Ethics in Washington (CREW) report (2009).)

1 The literature and Plaintiffs eye-witness experience proves that politically-connected Silicon Valley  
 2 tech firms monthly obtain economic favors, such as securing favorable legislation, special tax  
 3 exemptions, having preferential access to finance, receiving government contracts, or help in  
 4 dealing with regulatory agencies. The evidence proves that Google's support, for example, can help  
 5 in winning elections. For example, firms can vary the number of people they employ, coordinate the  
 6 opening and closing of plants, and increase their lending activity in election years in order to help  
 7 incumbent politicians get re-elected. (See Roberts 1990; Snyder 1990; Langbein and Lotwis 1990;  
 8 Durden, Shorgen, and Silberman 1991; Stratmann 1991, 1995, and 1998; Fisman 2001; Johnson and  
 9 Mitton 2003; Ansolabehere, Snyder, and Ueda 2004; Sapienza 2004, Dinç 2005; Khwaja and Mian  
 10 2005; Bertrand, Kramarz, Schoar, and Thesmar 2006; Faccio 2006; Faccio, Masulis, and  
 11 McConnell 2006; Jayachandran 2006; Leuz and Oberholzer-Gee 2006; Claessens, Feijen, Laeven  
 12 2008; Desai and  
 13 Olofsgard 2008; Ramanna 2008; Goldman, Rocholl, and So 2008, 2009; Cole 2009; Cooper, Gulen,  
 14 and Ovtchinnikov 2009; Correia 2009; Ramanna and Roychowdhury 2010; Benmelech and  
 15 Moskowitz 2010.)

16 The share ownership of politicians serves as a mechanism to quid-pro-quo their relationships  
 17 with big tech firms, is as follows: The ownership of politicians plays multiple distinct (but not  
 18 necessarily independent) roles; one that relies upon the amount of ownership and one that does not.  
 19 First, as investors in firms, politicians tie their own interests to those of the firm. Thus, harming  
 20 (benefiting) the firm means harming (benefiting) the politician and vice versa. By owning a firm's  
 21 stock, politicians commit their personal wealth to the firm and reduce a firm's uncertainty with  
 22 regard to their actions toward the firm. This will, in turn, enhance the firm's incentive to support the  
 23 politician-owner during both current and future elections in order to prolong the incumbency period  
 24 for as long as possible. Firms have their lobbyists push to be able to know the amount of ownership  
 25 likely to be material to politicians. This knowledge, in turn, enables them to judge whether the  
 26 politician's interest is aligned with the firm's interest and optimize quid-pro-quo.

27 Per [Christine Lakatos](#) 2014 began with a bang: "[Obama's Second Term Is All About](#)  
 28 [Climate Change](#)." *New York Magazine*, in their reporting, claimed that the evidence of this has to do

1 with President Obama’s appointment of John Kerry (“longtime climate obsessive”) as Secretary of  
2 State, as well as other key green appointees.

3 ( [https://nymag.com/daily/intelligencer/2014/01/obamas-second-term-is-all-about-climate-](https://nymag.com/daily/intelligencer/2014/01/obamas-second-term-is-all-about-climate-change.html)  
4 [change.html](https://nymag.com/daily/intelligencer/2014/01/obamas-second-term-is-all-about-climate-change.html) )

5 Kerry, by the way, while recently in Indonesia, blasted climate change deniers, warning,  
6 “Climate change may be the world’s ‘most fearsome’ weapon of mass destruction and urgent action  
7 is needed to combat it,” [wrote](#) CBC News Canada.

8 ( [https://www.cbc.ca/news/canada/toronto/john-kerry-blasts-climate-change-deniers-shoddy-](https://www.cbc.ca/news/canada/toronto/john-kerry-blasts-climate-change-deniers-shoddy-scientists-1.2539163)  
9 [scientists-1.2539163](https://www.cbc.ca/news/canada/toronto/john-kerry-blasts-climate-change-deniers-shoddy-scientists-1.2539163) )

10 This scare tactic — now adding to the long list of liberal crap, which includes ludicrous  
11 allegations that climate change [will lead to](#) “an orgy of killing, looting, rape and burglary” (just ask  
12 James Delingpole) — surfaced just weeks after President Obama’s State of the Union address  
13 (January 28, 2014) where he emphatically [declared](#) that the climate change debate is over.

14 ( [https://www.breitbart.com/Breitbart-London/2014/02/28/Rape-Muder-Chocolate-](https://www.breitbart.com/Breitbart-London/2014/02/28/Rape-Muder-Chocolate-Shortages-Is-There-Anything-Climate-Change-doesn-t-Cause)  
15 [Shortages-Is-There-Anything-Climate-Change-doesn-t-Cause](https://www.breitbart.com/Breitbart-London/2014/02/28/Rape-Muder-Chocolate-Shortages-Is-There-Anything-Climate-Change-doesn-t-Cause) )

16 ( [https://www.politico.com/blogs/politico-live/2014/01/obama-climate-change-is-a-fact-](https://www.politico.com/blogs/politico-live/2014/01/obama-climate-change-is-a-fact-182145.html)  
17 [182145.html](https://www.politico.com/blogs/politico-live/2014/01/obama-climate-change-is-a-fact-182145.html) )

18 But the debate is settled. Climate change is a fact. And when Plaintiffs children’s children  
19 look us in the eye and ask if we did all we could to leave them a safer, more stable world, with new  
20 sources of energy, I want us to be able to say yes, we did.

21 A claim that many Americans, including *Washington Post* columnist Charles Krauthammer,  
22 find “[absurd](#)” — with [even](#) co-founder of Greenpeace Patrick Moore, last month, [stating](#) to  
23 members of the Senate Environment and Public Works Committee that there is no scientific proof  
24 of man-made climate change.

25 ( [https://dailycaller.com/2014/02/17/krauthammer-the-president-pretends-that-this-is-all-](https://dailycaller.com/2014/02/17/krauthammer-the-president-pretends-that-this-is-all-settled-science/)  
26 [settled-science/](https://dailycaller.com/2014/02/17/krauthammer-the-president-pretends-that-this-is-all-settled-science/) )

27 ( [https://www.thenewamerican.com/tech/environment/item/17736-no-proof-of-man-made-](https://www.thenewamerican.com/tech/environment/item/17736-no-proof-of-man-made-climate-change-says-greenpeace-co-founder)  
28 [climate-change-says-greenpeace-co-founder](https://www.thenewamerican.com/tech/environment/item/17736-no-proof-of-man-made-climate-change-says-greenpeace-co-founder) )

( [https://www.epw.senate.gov/public/index.cfm?FuseAction=Files.View&FileStore\\_id=415b9cde-e664-4628-8fb5-ae3951197d03](https://www.epw.senate.gov/public/index.cfm?FuseAction=Files.View&FileStore_id=415b9cde-e664-4628-8fb5-ae3951197d03) )

The president, during his speech, which was a “[call to action](#)” with or without Congress, also [pumped up](#) his “all the above” energy strategy, asserting that it was working: “America is closer to energy independence.” Later, Mr. Obama claimed that his energy policy “was creating jobs and leading to a cleaner, safer planet.”

( <https://www.cnn.com/2014/01/28/politics/2014-state-of-the-union/index.html> )  
( [https://www.washingtonpost.com/politics/full-text-of-obamas-2014-state-of-the-union-address/2014/01/28/e0c93358-887f-11e3-a5bd-844629433ba3\\_story.html](https://www.washingtonpost.com/politics/full-text-of-obamas-2014-state-of-the-union-address/2014/01/28/e0c93358-887f-11e3-a5bd-844629433ba3_story.html) )

While Marita Noon (energy expert and Towhall.com [columnist](#)) has continually tackled the president’s so-called “energy independence” assertion, together we have debunked the green jobs hype and deception many times, including in my recent study on the [Obama-backed green energy failures](#).

( <https://greencorruption.blogspot.com/2014/01/cleantech-crash-cbs-lesley-stahl.html> )

Moreover, a year ago, we blew the lid off of [Climate Hawk Kerry](#) and his part in green corruption. What’s most disingenuous is that while Kerry preaches “global warming doom and gloom,” his “government carbon footprint” is [enormous](#) — with no end in sight. (And who’s tracking his personal carbon footprint?)

( [https://greencorruption.blogspot.com/2013/01/climate-hawk-senator-john-kerry-and-his.html#.Uuu0Tyhc\\_zJ](https://greencorruption.blogspot.com/2013/01/climate-hawk-senator-john-kerry-and-his.html#.Uuu0Tyhc_zJ) )

( <https://freebeacon.com/politics/analysis-john-kerrys-carbon-footprint-is-enormous/> )

Worse, Kerry played a part in crafting President Obama’s 2009 stimulus bill, which was a piece of legislation that allowed him to create a *financial footprint* inside this scandal as well. This includes *timely* green energy investments with the Big VC firm Kleiner Perkins (where “climate billionaires” John Doerr and Al Gore are partners) that will be mentioned many times in this post, including the fact that this firm was a huge winner from the Green Bank of Obama.

The massive spending bill, commonly known as the economic stimulus package, which was [signed into law](#) five years ago, was marketed as a means to save Plaintiffs economy from the brink

1 of disaster and create American jobs.

2 ( [https://thehill.com/blogs/on-the-money/economy/198547-white-house-touts-stimulus-on-](https://thehill.com/blogs/on-the-money/economy/198547-white-house-touts-stimulus-on-fifth-anniversary)  
3 [fifth-anniversary](https://thehill.com/blogs/on-the-money/economy/198547-white-house-touts-stimulus-on-fifth-anniversary) )

4 If you caught Michelle Malkin's [tribute](#) to the so-called (failed) Recovery Act, you'll  
5 discover, "The actual cost of the \$800 billion pork-laden stimulus has ballooned to nearly [\\$2](#)  
6 [trillion](#)."

7 ( [https://michellemalkin.com/2014/02/14/5-years-later-hows-that-wreckovery-working-out-](https://michellemalkin.com/2014/02/14/5-years-later-hows-that-wreckovery-working-out-for-ya/)  
8 [for-ya/](https://michellemalkin.com/2014/02/14/5-years-later-hows-that-wreckovery-working-out-for-ya/) )

9 ( [https://www.washingtonpost.com/blogs/wonkblog/post/the-real-price-tag-for-stimulus-](https://www.washingtonpost.com/blogs/wonkblog/post/the-real-price-tag-for-stimulus-between-1-trillion-and-17-trillion/2011/08/25/gIQA2Cc41Q_blog.html)  
10 [between-1-trillion-and-17-trillion/2011/08/25/gIQA2Cc41Q\\_blog.html](https://www.washingtonpost.com/blogs/wonkblog/post/the-real-price-tag-for-stimulus-between-1-trillion-and-17-trillion/2011/08/25/gIQA2Cc41Q_blog.html) )

11  
12 Even Speaker of the House John Boehner [weighed in](#), "The 'stimulus' has turned out to be a  
13 classic case of big promises and big spending with little results ..."

14 ( [https://dailycaller.com/2014/02/17/obama-quiet-as-gop-taunts-him-for-failed-stimulus-](https://dailycaller.com/2014/02/17/obama-quiet-as-gop-taunts-him-for-failed-stimulus-plan/)  
15 [plan/](https://dailycaller.com/2014/02/17/obama-quiet-as-gop-taunts-him-for-failed-stimulus-plan/) )

16 Tucked inside was approximately \$100 billion earmarked for renewable energy, which  
17 [became](#) "a special-interest feeding frenzy."

18 ( [https://washingtonexaminer.com/obamas-stimulus-became-a-special-interest-feeding-](https://washingtonexaminer.com/obamas-stimulus-became-a-special-interest-feeding-frenzy/article/2544230)  
19 [frenzy/article/2544230](https://washingtonexaminer.com/obamas-stimulus-became-a-special-interest-feeding-frenzy/article/2544230) )

20 **Obama's Second Term Agenda: Climate change by executive fiat & billions more of**  
21 **taxpayer cash**

22 Obama has [continually pledged](#) during his second term, that he will be "governing  
23 unilaterally, by executive order and by regulatory mandate," [warned](#) a *Washington Times* reporter  
24 — thus his [weapons of warfare](#) are his "pen and phone." Forget about the Constitution and its check  
25 and balances.

26 Even as those on the Right are up in arms over in the president's [excessive use](#) (and abuse)  
27 of executive power, leading Democrats are [applauding this move](#) and pushing for more. Yet if we  
28 go back in time to 2008, we find that then-candidate Obama played a different tune, [slamming](#)



1 President Bush's use of executive action.

2 The author of the *New York Magazine* [piece](#) also noted that other than Secretary of State  
3 John Kerry, several Obama second-term moves signal the high priority he assigns the issue of  
4 climate change: "This is true not only of the figures Obama has appointed to posts that inherently  
5 concern climate change, like his [green appointees](#) to run the Environmental Protection Agency  
6 [EPA] and The U.S. Government [GOVT], but also to general political advisors, like Denis  
7 McDonough and John Podesta, both committed environmentalists who will drive Obama's climate  
8 focus" — both McDonough and Podesta from the left-wing think tank, Center for American  
9 Progress (CAP), and the focus of this Green Corruption File.

10 Podesta, who in November 2013, [was spotted](#) at a fundraising event for Hillary Clinton,  
11 [according to](#) the *Washington Post*, "Is expected to stay with the Obama administration for a just a  
12 year, freeing him to join the campaign of Mrs. Clinton if she runs for president in 2016." It turns out  
13 that McDonough was the one that brokered his "executive power gig," of which "Podesta's  
14 portfolio would be broad and would include climate-change issues and executive actions, as well as  
15 the troubled health-care law," [reported](#) the *Washington Post*.

16 As Kerry and Obama continue their campaign of "climate disaster on the horizon," the  
17 strategic [move](#) in adding Podesta as White House counselor had already signaled an aggressive  
18 approach to their radical, expensive and deceptive green energy agenda. In fact, Podesta began is  
19 his role inside the Obama White House by stirring up the liberal base, when in a [profile published](#)  
20 on December 17, 2013 by POLITICO, "Podesta is quoted comparing Republicans to the infamous  
21 cult led by Jim Jones, who was responsible for the 1978 cyanide poisoning of more than 900 of his  
22 followers in Guyana..." — only to later [apologize](#) via twitter of all places.

23 Now [labeled](#) "climate change and energy transformation agenda," Obama and his minions  
24 have been, and continue to push through their radical views with [mandates, regulations](#) and  
25 legislation, which benefits special interest groups and the Obama administration's green cronies,  
26 while adversely affecting American families. Even the non-partisan organization Reason.com, too,  
27 sees the [dire reality](#) here: "Obama's [Climate Five-Year] plan ambitiously seeks to control nearly  
28 every aspect of how Americans produce and consume energy." One of those is directing the

1 Environmental Protection Agency (EPA) “to work expeditiously to complete carbon pollution  
2 standards for both new and existing power plants.”

3 Using the iron fist of the EPA — a key department in Obama’s “war on energy” known for  
4 its [abuse of power](#) — the president also tried to force refiners to produce cellulosic biofuels.  
5 However, [as noted by](#) Political Outcast, “The standards set were completely unrealistic and  
6 unattainable.” On the horizon are new [green rules](#) for trucks, buses and other heavy-duty vehicles,  
7 as well as whatever *maneuvers* the White House deems suited for their “[green energy revolution](#).”

8 Additionally, whether we like it or not, this clean-energy mission is funded by taxpayers —  
9 President Obama’s “save the planet slush fund.” A March 2012 [report](#) by the Brookings Institute  
10 places the Obama administrations’ “total government spending (both stimulus and non-stimulus) on  
11 green initiatives at [\\$150 billion through 2014](#). But that’s not enough to save the planet. Last month,  
12 the president [began pushing](#) for a \$1 billion taxpayer-funded program “to help communities across  
13 the country prepare for the effects of climate change” — AKA the climate resilience fund. This  
14 program is separate from the “[Climate Action Plan](#)” that the president introduced in June 2013,  
15 which also calls for releasing [more taxpayer money](#) (\$8 billion [from](#) the GOVT Loan Guarantee  
16 Program).

17 Furthermore, Obama’s GOVT is [attempting to establish](#) a new renewable energy section  
18 (under the GOVT Loan Guarantee Program), for grid-integrated green power projects — with the  
19 plan of spending anywhere from \$1.5 billion to as much as \$4 billion of taxpayer money. The  
20 Obama administration is also [restarting](#) the GOVT’s Advanced Technology Vehicles  
21 Manufacturing ([ATVM](#)), which is also part of the GOVT Loan Guarantee Program — with more  
22 than \$15 billion in remaining authority.

23 This is the same Energy Department program which the Green Corruption Files has exposed  
24 many times how, in the process of doling out \$34 billion of taxpayer money, at least 90 percent of  
25 the recipients have *meaningful* politically connections (bundlers, top donors, fundraisers, etc) to the  
26 president and other high-ranking Democrats — in many cases, to both. While the GOVT will have  
27 you believe that these loans were based on “merit,” the kicker is that in March 2012, the House  
28 Oversight and Government Reform committee [unleashed a damaging report](#) revealing that the

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1 stimulus-created 1705 section of the GOVT's Loan Program had doled out in excess of \$16 billion  
2 to 26 projects, of which 22 of the loans were rated "Junk" grade due to their poor credit quality.  
3 "The remaining ended up on lowest end of the investment grade of categories, giving the GOVT's  
4 1705 loan portfolio an overall average of BB-."

5 So, it's no wonder that this loan program fostered big [alternative energy losers](#) such as  
6 Solyndra, Beacon Power, Abound Solar, Vehicle Production Group, and Fisker Automotive,  
7 flushing billions of tax dollars down the toilet — with billions more still at risk. Yet, the loan  
8 program is not the only one place you'll find the president's "cleantech" losers. In January, I  
9 released my new study, [documenting](#) 32 Obama-backed green energy failures, while tracking the  
10 financially troubled, and even those, ironically, having environmental issues as well — over 30 and  
11 counting.

12 Besides the fact that the Energy Department [continues to subsidize](#) green energy, there are  
13 also many stimulus-created programs that have been extended and are still dishing out "the green."

14 ( [https://www.hydrogenfuelnews.com/GOVT-offers-funding-geothermal-energy-research/  
15 8516476/](https://www.hydrogenfuelnews.com/GOVT-offers-funding-geothermal-energy-research/8516476/) )

16 One of the largest is the [1603 Grant Program](#), which to date has awarded over \$20 billion of  
17 tax-free cash. The Advanced Energy Manufacturing Tax Credit program ([48C Program](#)), which was  
18 funded by \$2.3 billion, just unleashed Phase II.

19 ( <https://www.treasury.gov/initiatives/recovery/Pages/1603.aspx> )

20 ( [https://energy.gov/downloads/48c-phase-ii-advanced-energy-manufacturing-tax-credit-  
21 program-selections](https://energy.gov/downloads/48c-phase-ii-advanced-energy-manufacturing-tax-credit-program-selections) )

22  
23 The currently passed 1,000-page [trillion-dollar farm bill](#) will continue to fund renewable  
24 energy programs such as the Biorefinery Assistance Program, administered by the U.S. Department  
25 of Agriculture's (USDA). The USDA, with \$1.02 billion in loan power, along with \$600 million  
26 stimulus funds from the Energy Department and a \$132 million GOVT stimulus loan, used taxpayer  
27 money to fund 31 "not so shovel-ready" risky projects (also politically connected) — of which last  
28 time I checked (August 2013), about a third were having issues.

( <https://www.omaha.com/apps/pbcs.dll/article?AID=/20140129/NEWS/140128521/1689> )

### Podesta Power

Over the course of unleashing this scandal, I've hinted that CAP is a dark, driving force behind President Obama's massive green energy scheme — roles that range from legitimate to shady lobbying practices, to the fact that numerous CAP "fellows" were at the helm of the green energy deal making, holding key positions inside the Obama White House, his Green Team, and his Energy Department.

Today's Green Corruption File will connect the dots as to Center for American Progress' part in this scam, while shedding light on old and new data. As I *progress*, I'll expose its alternative energy advocacy as well as its funders — corporate donors that were kept secret until their release in late 2013 — **with those in the renewable energy business (at least 17) cashing in at the Green Bank of Obama.**

Let's go back in time when Podesta — former chief of staff to President Bill Clinton — was *infamous* for what is dubbed "[Project Podesta](#)": "This was a system that enabled the Clintons to push through unpopular policies that neither Congress nor the American people wanted. Its implementation marked a dramatic tilt in the balance of power, giving the executive branch an unprecedented ability to force its will on the legislative branch," documented [DiscoverTheNetworks.com](#).

Most know that in 2003, Podesta founded CAP, which as mentioned, is organization funded by billionaire George Soros, who has a [massive footprint](#) inside this green corruption scandal. He then served as the organization's president and CEO, of which it was [reported](#), "Podesta was hand-picked for the job by CAP co-founders Soros and Morton H. Halperin."

In 2008 and early 2009, Podesta, an Obama bundler, while still at CAP, [ran](#) Obama's transition team as the co-chair [along side](#) Valerie Jarrett and [Peter Rouse](#). Meanwhile by 2011, Podesta stepped down from his CEO role and [became the](#) Chair of CAP and the CAP Action Fund — only to leave CAP and join the White House at the end of 2013 in his new role as Obama's "[executive power czar](#)."

1 But if you go back to right after the Republican 2010-midterm victory, Podesta already had  
2 a plan: “The president should bypass Congress and wield the executive powers of his office,”  
3 [reported](#) Bloomberg last December. In fact, “Podesta had compiled 47 pages of proposals for  
4 unilateral action on issues from immigration to solar energy.” Podesta even [wrote the foreword](#) for  
5 that [CAP report](#) “on *how* the president could use his executive authority to advance a progressive  
6 agenda, including actions to unilaterally force the U.S. economy to become greener.”

7 Furthermore, Podesta has served as an Independent Advisory Council [member](#) of the  
8 notoriously corrupt community organization [ACORN](#). Podesta was also on the board of the Apollo  
9 Alliance as late as 2011. While I’ve unleashed the Apollo Alliance (now BlueGreen Alliance) and  
10 [their](#) part inside this massive clean-energy scam, I’ll briefly touch upon them again today. But  
11 what’s key here is that Apollo is [another](#) Soros-funded left-wing organization, who along with its  
12 “[green jobs radical network](#),” exerts powerful influence on the views and policies of the Obama  
13 administration — and they too were involved in drafting the 2009-Recovery Act.

#### 14 **CAP’s Left-wing Billionaire George Soros: Obama’s “agent of green”**

15 Meanwhile, [Soros](#) is one of the 2009 stimulus authors that [I had covered](#) in October 2013:  
16 Those individuals and groups that were involved in crafting the clean-energy sector of the [2009](#)  
17 [Recovery Act](#), and who ultimately financially benefited directly (and/or their invested firms, family  
18 or friends) from the \$100 billion that [was earmarked](#) for renewable energy.

19 According to Peter Schweizer’s blockbuster 2011 bestseller [Throw Them All Out](#):

20 Billionaire George Soros gave advice and direction on how President Obama should allocate  
21 so-called “stimulus” money in a series of regular private meetings and consultations with White  
22 House senior advisers even as Soros was making investments in areas affected by the stimulus  
23 program.

24 While we know that early on, [Soros had visited the White House](#) on at least five occasions  
25 since Barack Obama became president, possibly more, Schweizer gives specifics, “Mr. Soros [met](#)  
26 [with](#) Mr. Obama’s top economist, [Larry Summers — also a CAP fellow] on February 25, 2009 and  
27 twice more with senior officials in the Old Executive Office Building on March 24th and 25th as the  
28 stimulus plan was being crafted. Later, Mr. Soros also participated in discussions on financial

1 reform.”

2 As documented by Schweizer, “In the first quarter of 2009, [Mr. Soros went](#) on a stock-  
3 buying spree in companies that ultimately benefited from the federal stimulus,” including twelve  
4 alternative energy and utility companies. Moreover, if we add in other Soros green energy  
5 investments that bagged “green” funds, we can confirm that this Soros is connected to at least \$11  
6 billion from the Green Bank of Obama, the majority from the 2009-Recovery Act.

7 Due to the fact that Soros is a well-known donor to CAP, here’s a sneak peek of what I  
8 personally tracked in my [March 2013 Green Corruption File](#), exposing how this left-wing  
9 billionaire not only bankrolled Obama’s 2008 and 2012 campaigns, but cashed in on the stimulus  
10 bill that he helped craft. Interestingly, four of these companies are also CAP corporate donors  
11 (marked with an asterisks), which will be detailed later.

12 • **Brookfield Asset Management (BAM):** As documented in the March 20, 2012  
13 House Oversight [report](#) on the GOVT’s disastrous loan program, “George Soros and Martin  
14 J. Whitman, both prominent Democratic donors, are both heavily invested in Brookfield.” In  
15 September 2011, The Granite Reliable wind project [was awarded](#) \$168.9 stimulus loan,  
16 which is owned BAM. Then on May 23, 2012, they also snagged a \$56 million [1603](#)  
17 [stimulus grant](#) for “wind in New Hampshire.” While there are [additional ties](#) to this wind  
18 deal that I’ll highlight later when I get to Heather Podesta (super lobbyists sister-in-law of  
19 John Podesta), whose firm [Heather Podesta & Partners](#), from 2009 until 2012, served as  
20 [lobbyists](#) for BAM.

21 • **First Solar\*:** Through various fund, and as early as 2007, Soros invested in First  
22 Solar — the big solar company that is tied to \$3 billion of the 1703 GOVT stimulus loans,  
23 including one project that was sold to NRG Energy — another Soros timely investment.

24 • **SolarCity:** In February 2012, the Private equity firm Silver Lake Kraftwerk [invested](#)  
25 [in SolarCity](#) — whereas in early 2011, Silver Lake [had launched](#) a clean energy fund in  
26 collaboration with billionaire Soros and Cathy Zoi (former GOVT Insider). SolarCity, which  
27 will be detailed later, so far (and since 2009) has been subsidized with “green” through  
28 various stimulus funds, grants and federal tax breaks at the tune of \$514 million.

Soros' Twelve "Stimulus" Green Energy Stock-Buying Spree:

1. **NRG Energy and its subsidiaries:** Initially won \$5.2 billion in 1705 stimulus loans for four projects and at least 65 grants that total over \$363 million of taxpayer money with 37 unaccounted for. Plus much more green energy funds through various alliances.

2. **American Electric Power (AEP)\*:** at least four stimulus grants totaling \$740 million. Plus, more detailed later.

3. [Ameren](#): five stimulus grants totaling about \$672.5 million

4. [FirstEnergy Solutions](#): at least two stimulus grants totaling just over \$71 million.

No cash that I could find for BioFuel Energy benefited when the EPA announced a regulation on ethanol.

5. [Constellation\\*](#), an Exelon Company: at least one grant worth \$200 million stimulus grants and Constellation is one of the most prolific providers of green energy to federally owned facilities.

6. [Covanta Energy\\*](#): unclear as to how many green government subsidies or the exact dollar amount, but obviously Covanta stands to benefit from the NAT GAS Act if it comes to light again. And what about those [Congressional earmarks](#) Schweizer found?

7. [Edison International](#): at least two stimulus grants worth \$64.6 million, and I'm sure there are more...

8. [Entergy](#): I've only tracked two small stimulus grants, which add up to close to \$10 million

9. [PPL Corporation](#): I found one stimulus grant at \$19 million

10. [PSEG](#): one stimulus grant for \$76 million.

11. [Powerspan Clean Energy Technology](#): one large stimulus grant worth \$100 million

**Mr. & Mrs. Podesta the Super Lobbyists: Strike "green" gold**

In my [June 2013](#) Green Corruption File, I briefly addressed John Podesta, but more so profiled his brother, Tony Podesta — dubbed "The Lobbyist" by *Newsweek*, and the founder and Chairman at the Podesta Group, which he [started](#) with his brother John in 1987.

Even though [news hit](#) in early 2013, that Heather and Tony Podesta, the married super



1 lobbyists separated, they are both (via different firms) tied to numerous Obama-backed clean-  
2 energy deals.

3 As [documented by](#) the Center for Responsive Politics, you'll find that the [Podesta Group](#)'s  
4 lobbying income went from \$16,070,000 in 2008 to \$25,780,000 in 2009, and has since  
5 significantly increased. Their client lists (past and present) includes large corporations such as Bank  
6 of America, BP America, and General Electric (GE aviation), General Motors, and Google  
7 (Computers/Internet) — all in the green energy business, with BofA, GE and Google also CAP  
8 donors that won green energy funds from the Obama administration.

### 9 ***CH2M Hill***

10 Nevertheless, there are quite a few others, of which [in 2009](#), the Podesta Group took on as  
11 clients that stand out — those that ultimately won a significant amount of stimulus funds, starting  
12 with CH2M Hill that [received](#) \$1.3 billion for the clean up at the Hanford Nuclear Reservation. The  
13 details on this special stimulus earmark can be found in my June 2013 "[Nuclear Crimes and](#)  
14 [Misdemeanors](#)" story, which highlights not only the cronyism and corruption, but the fact that in  
15 June 2013, CBS News [reported](#) that this costly project has been plagued with problems, "delays and  
16 billions over budget."

### 17 ***SolarReserve***

18 SolarReserve got special treatment from the Department of Interior (DOI) for their [Crescent](#)  
19 [Dunes Solar Energy Project](#) located in Tonopah, Nevada, which received a [\\$737 million](#) GOVT  
20 stimulus loan.

21 ( <https://www.solarreserve.com/en/newsroom/photos/crescent-dunes-solar-energy-plant> )

22 ( <https://lpo.energy.gov/projects/solarreserve-llc-crescent-dunes/> )

23 SolarReserve also snagged stimulus grants, yet the amount is unknown. This large GOVT  
24 deal (another non-grade investment) was announced on [May 19, 2011](#), and despite those inside the  
25 Energy Department that wanted to "kill the transaction," it was [finalized](#) on September 28, 2011.

26 ( [https://www.solarreserve.com/en/newsroom/press-releases/us-department-of-energy-](https://www.solarreserve.com/en/newsroom/press-releases/us-department-of-energy-offers-a-conditional-commitment-for-737-million-loan-guarantee-to-solarreserve-for-nevada-solar-project/@@download/file/)  
27 [offers-a-conditional-commitment-for-737-million-loan-guarantee-to-solarreserve-for-nevada-solar-](https://www.solarreserve.com/en/newsroom/press-releases/us-department-of-energy-offers-a-conditional-commitment-for-737-million-loan-guarantee-to-solarreserve-for-nevada-solar-project/@@download/file/)  
28 [project/@@download/file/](https://www.solarreserve.com/en/newsroom/press-releases/us-department-of-energy-offers-a-conditional-commitment-for-737-million-loan-guarantee-to-solarreserve-for-nevada-solar-project/@@download/file/)



1 [SolarReserveLGPConditionalCommitmentAnnouncement\\_Macquarie051911.pdf](#) )

2 ( [https://energy.gov/articles/energy-department-finalizes-737-million-loan-guarantee-](https://energy.gov/articles/energy-department-finalizes-737-million-loan-guarantee-tonopah-solar-energy-nevada-project)  
3 [tonopah-solar-energy-nevada-project](https://energy.gov/articles/energy-department-finalizes-737-million-loan-guarantee-tonopah-solar-energy-nevada-project) )

4  
5 Along the way, it included “relentless assistance” by the Majority Leader Harry Reid as well  
6 as some drama. Not to mention, SolarReserve, a [predominately](#) Democrat donor, [executives](#) had  
7 given to Reid’s campaign since 2008.

8 ( <https://www.opensecrets.org/orgs/summary.php?id=D000056865&cycle=A> )

9 ( <https://freebeacon.com/issues/solar-shenanigans/> )

10 Needless to say, there are more SolarReserve investors in the mix that can be found in my  
11 [November 2013 Green Corruption File](#): “Underneath Senator Harry Reid’s Clean-Energy Dirt:  
12 Career politician directly linked to over \$3 billion in green energy stimulus loans.”

13 ( [https://greencorruption.blogspot.com/2013/11/underneath-senator-harry-reids-](https://greencorruption.blogspot.com/2013/11/underneath-senator-harry-reids-clean.html#.UweEbCiRnzI)  
14 [clean.html#.UweEbCiRnzI](https://greencorruption.blogspot.com/2013/11/underneath-senator-harry-reids-clean.html#.UweEbCiRnzI) )

15 One of the key connections to this deal is Citigroup, who has been a major investor in Solar  
16 Reserve since 2008, which is chronicled in my February 2013 post, “[Citigroup’s Massive ‘Green’](#)  
17 [Money Machine](#).” Still, since Citigroup is also a CAP corporate donor, we’ll dig deeper later.

18 ( [https://greencorruption.blogspot.com/2013/02/citigroups-massive-green-money-](https://greencorruption.blogspot.com/2013/02/citigroups-massive-green-money-machine.html#.UlhdqOBc_zJ)  
19 [machine.html#.UlhdqOBc\\_zJ](https://greencorruption.blogspot.com/2013/02/citigroups-massive-green-money-machine.html#.UlhdqOBc_zJ) )

### 20 ***General Motors & the Chevy Volt***

21 General Motors (GM) — the failed Big Auto company that was [bailed out](#) by taxpayers in  
22 2009 — was a client of the Podesta Group [from 2010](#) until 2012. GM was also a [CAP donor](#) in  
23 2011, and a big recipient of stimulus money. Starting in 2009 until recently, they have bagged  
24 hundreds of millions of stimulus dollars (I tracked \$471.6 million so far) to support the Chevy Volt  
25 as well as green car components, of which I’ll get more specific when I dissect CAP’s corporate  
26 donors.

### 27 ***Duke Energy***

28 Duke Energy, the nation’s largest electric power company, is another CAP corporate donor,

1 which has been a client of the Podesta Group since 2009. What's interesting here is that Jim Rogers,  
2 the chairman of Duke Energy is another Obama donor, and was a [major player](#) at the 2012  
3 Democratic convention, as a contributor, creditor, host, and a speaker. Duke Energy won hundreds  
4 of millions of green energy money for various projects, which will be detailed later.

### 5 ***Progress Energy***

6 From 2011 to 2012, the Podesta Group added Progress Energy, which in 2009, [won](#) a \$200  
7 million smart-grid stimulus grant. Progress Energy is a [customer](#) of Silver Spring Networks that is a  
8 [Foundation Capital](#), Kleiner Perkins, and Google [investment](#) — all with friends and ties to the  
9 Obama White House that will be documented a few times in the post.

### 10 ***SolarCity & SunEdison***

11 Additionally, in 2012, the Podesta Group added SolarCity and SunEdison to its list of clients  
12 — both members of ACORE, the renewable energy [lobby powerhouse](#) that helped “design The U.S.  
13 Government grant programs that partly offset the loss of tax equity financing arrangements.” This is  
14 part of the green corruption story that I chronicled in my post, “[The RAT in the Recovery and the](#)  
15 [Gang of Ten](#).”

16 Founded in 2006, [SolarCity](#) has a string of connections to the Obama White House that I've  
17 been tracking and reporting on for some time, including billionaire players that received taxpayer  
18 money for other green energy deals, such as Elon Musk, [Nicholas J. Pritzker](#), and George Soros.  
19 Throw in other stimulus winners like Al Gore's firm Generation Investment Management ([early](#)  
20 [investor](#) and [major stockholder](#)) as well as Obama's Wall Street buddies: Goldman Sachs, [Bank of](#)  
21 [America](#), and [Citigroup](#). In between, SolarCity has developed partnerships with [PG&E](#), and  
22 [Google](#). But before Podesta came along in 2012, SolarCity had been an energy client of top D.C.  
23 lobbyist McBee Strategic Consulting, since 2009 — another [major green corruption villain](#) that I  
24 tackled in September 2013.

25 Nevertheless, Fox News [reported](#) in December 2012, when SolarCity was under a federal  
26 probe that they had applied for \$341 million in grants. However, I found 33 federal stimulus grants  
27 [from the 1603 Program](#) that were awarded to SolarCity and [USB SolarCity Master Tenant](#) in 2011  
28 and 2012, ranging across 15 states, totaling over \$92 million.

MARCH 9, 2013 SolarCity UPDATE: Right after this publishing this post, it was brought to my attention that SolarCity, whose success is dependent on government handouts, has received additional green energy subsidies, which places their total at \$514 million.

According to [California Watchdog.org](http://CaliforniaWatchdog.org)...

( <https://watchdog.org/130098/solarcity-horror-stories/> )

SolarCity has accepted more than [\\$11 million in federal stimulus funds](#) [from September 2009 to March 2010] to make its business run. But the real public support appears elsewhere. Because SolarCity technically owns the energy systems it installs, SolarCity — not the homeowner — earns the federal tax break intended as an incentive to go solar. So far the company has earned [\\$411 million in such tax breaks](#). The company also may earn additional income on state subsidies.

( <https://www.recovery.gov/arra/Transparency/RecoveryData/Pages/Recipient.aspx?duns=785156410> )

( [https://quote.morningstar.com/stock-filing/Quarterly-Report/2013/9/30/t.aspx?](https://quote.morningstar.com/stock-filing/Quarterly-Report/2013/9/30/t.aspx?t=XNAS:SCTY&ft=10-Q&d=91ea1bcddf31efc04556da7970ad5084)

[t=XNAS:SCTY&ft=10-Q&d=91ea1bcddf31efc04556da7970ad5084](https://quote.morningstar.com/stock-filing/Quarterly-Report/2013/9/30/t.aspx?t=XNAS:SCTY&ft=10-Q&d=91ea1bcddf31efc04556da7970ad5084) )

Meanwhile, SunEdison, a global provider of solar-energy services, was an early [Goldman Sachs](#) clean-energy investment — Goldman, another CAP donor, and huge winner from the Green Bank of Obama that I'll get to much later. But we can confirm that SunEdison, in 2013, won 5 federal stimulus grants [from the 1603 Program](#) for “solar electricity” that ranges across 5 states, totaling over \$1.8 million tax dollars.

( <https://www.businesswire.com/news/home/20060615005527/en/SunEdison-Announces-Capital-Raise-Goldman-Sachs-Lead> )

( [https://www.treasury.gov/initiatives/recovery/Pages/1603.aspx?](https://www.treasury.gov/initiatives/recovery/Pages/1603.aspx?utm_medium=email&utm_source=et&utm_content=http%3A%2F%2Fwww.treasury.gov%2Finitatives%2Frecovery%2FPages%2F1603.aspx&utm_campaign=1475793_209355_RNC%20Research)

[utm\\_medium=email&utm\\_source=et&utm\\_content=http%3A%2F%2Fwww.treasury.gov%2Finitatives%2Frecovery%2FPages%2F1603.aspx&utm\\_campaign=1475793\\_209355\\_RNC%20Research](https://www.treasury.gov/initiatives/recovery/Pages/1603.aspx?utm_medium=email&utm_source=et&utm_content=http%3A%2F%2Fwww.treasury.gov%2Finitatives%2Frecovery%2FPages%2F1603.aspx&utm_campaign=1475793_209355_RNC%20Research) )

### ***Granite Reliable / Brookfield Renewable Power***

On the other side, there is Granite Reliable that [received](#) a \$168.9 million stimulus loan in September 2011 for a wind project in Coos County, New Hampshire. Then on May 23, 2012, they

1 also snagged a \$56 million [1603 grant](#) for wind in New Hampshire, which I am assuming is the for  
2 the same project. Work on Granite Reliable's wind farm created 198 construction jobs and six  
3 permanent jobs.

4 Nancy Ann DeParle, President Obama's former Deputy Chief of Staff for Policy in the  
5 White House, had a [financial stake](#) in the success of Granite Reliable, due to the fact that she and sat  
6 on the Board of Directors for Noble Environmental Power, LLC, which owned Granite Reliable.

7 Obviously, this is a conflict of interest, but there are [additional ties](#) to this wind deal. Noble  
8 sold Granite Reliable in December 2010 to [Brookfield Asset Management](#) (BAM), just 6 months  
9 prior to the conditional approval (June 2011) of the GOVT loan guarantee and deep into the  
10 application process. Despite the [speculative credit rating](#), this loan was finalized in September 2011.

11 Not only was Brookfield Renewable Power ([a subsidiary of BAM](#)) represented by Citigroup  
12 as [lead advisor](#) during the loan review process, BAM has additional Democrat ties such as Diana  
13 Taylor, former New York City Mayor Michael Bloomberg's long-time girlfriend. As mentioned  
14 earlier, George Soros and Martin J. Whitman, which are both prominent Democratic donors, are  
15 both heavily invested in Brookfield.

16 But this case [directly hits](#) the Podesta family, because from 2009 until 2012, Heather  
17 Podesta, sister-in-law of John Podesta, via [Heather Podesta & Partners](#) served as [lobbyists](#) for BAM  
18 — and they've been lobbying on behalf of [Brookfield Power](#) (electric utilities), since 2011, raking  
19 in over \$1.3 million from the two connected groups.

### 20 ***Southern Company***

21 Mrs. Podesta's firm also represented [Southern Co.](#) from 2008 until 2010, raking in over  
22 \$300,000. This energy giant is part the [Vogtle Project](#), which in February 2010, won a massive  
23 [GOVT loan](#): "a conditional commitment for \$8.33 billion to support the construction of the nation's  
24 next generation of advanced nuclear reactors." Despite the project's [troubles](#) coupled with harsh  
25 [criticism](#), the Obama administration [just finalized](#) this GOVT deal.

26 Southern Company — a heavy hitter lobbyist and big donor to both political parties —  
27 [bankrolled](#) President Obama's 2013 Inauguration. And due to the fact that this was another GOVT  
28 loan approval that was *pressured* by the White House (this one in December 2009), further Intel is

found in my [July 2013 Green Corruption File](#), “Nuclear Disaster: \$10.33 billion in energy loans pressured by the White House and POTUS approved, now at risk.”

**Center for American Progress: The “green” pusher**

While CAP [characterizes](#) itself as “an independent nonpartisan educational institute dedicated to improving the lives of Americans through progressive ideas and action,” [according to](#) left-leaning Huffington Post, they’ve “been a vocal voice for this president’s policies in the media and on the Hill. But their area of highest visibility is advocacy for a clean-energy economy where John Podesta has personally led the effort.”

Of course, as a strong proponent of alternative energy, CAP has also been a big backer of the Energy Department’s huge multi-billion-loan guarantee program for renewable energy projects — a government program, of which the [stimulus law](#) added \$16 billion in lending power (the GOVT’s “junk bond” and cronyism [portfolio](#)), where we find that many of CAP’s corporate donors have cashed in big time.

We also know that [according to](#) the Washington Free Beacon, in September 2008, CAP “authored a [report](#) titled “Green Recovery: A Program to Create Good Jobs and Start Building a Low-Carbon Economy” that included many recommendations ultimately incorporated into President Obama’s controversial \$800 billion stimulus package.” But CAP is not done: since the president released his [Climate Action Plan](#) in June 2013, CAP continues to [pressure](#) for additional [action](#), including, but not limited to, rejecting the Keystone XL pipeline and a call to dole out [billions more](#) in renewable energy funds.

[CAP](#), the progressive think tank with [deep rooted ties](#) to the Clintons, has been on my radar since 2010, and periodically mentioned throughout my work. As noted already, they are [closely aligned](#) with, and have a major foothold [inside](#) the Obama White House. This is not limited to the new CAP additions: [Denis McDonough](#), White House Chief of Staff and Obama’s new advisor, John Podesta.

What’s been forgotten is that a squadron of CAP experts worked with President Obama’s transition team, and they have been “reportedly [highly influential](#) in helping to craft White House Policy.” In 2008, [Edwin Chen](#) of Bloomberg, in his article, “Soros-Funded Democratic Idea Factory

Becomes Obama Policy Font,” noted “CAP, which has 180 staffers and a \$27 million budget, devotes as much as half of its resources to promoting its ideas through blogs [ThinkProgress and the Wonk Room], events, publications and media outreach.”

In fact [CAP boasts](#) of John Podesta’s part: “Podesta served as co-chair of President Barack Obama’s transition, where he coordinated the priorities of the incoming administration’s agenda, oversaw the development of its policies, and spearheaded its appointments of major cabinet secretaries and political appointees.”

In addition to Podesta as the co-chair, “at least 10 other CAP experts” were advising the incoming administration, “including Melody Barnes (Obama bundler), the center’s executive vice president for policy who co-chairs the agency-review working group and Cassandra Butts, the senior vice president for domestic policy, who is now a senior transition staffer,” reported Bloomberg.

What has not been widely disclosed is CAP’s *dark* participation, other than their “recommendations,” inside the stimulus package, whereas as noted, \$100 billion was earmarked for renewable energy. Hidden deep inside the 1,073-page stimulus bill, which was [drafted by](#) the Obama transition team and congressional aides, was a RAT: an attempt to suppress potential investigations, and only a few news outlets caught it in February of 2009: the [Washington Post](#) and the [Washington Examiner](#), and completely exposed in my Green Corruption File entitled, “[The RAT in the Recovery and the Gang of Ten](#).”

Entitled the [Obama-Biden Transition Project](#), it employed approximately 400 people and it was comprised of Obama bundlers and campaign contributors as well as lobbyist and those that operate inside Washington’s egregious revolving door. What’s more fascinating to point out is that [according to](#) the Center for Responsive Politics, “Members of Barack Obama’s presidential transition team weren’t necessarily selected solely on their resumes and expertise — some may have scored positions over similarly qualified individuals because they supported the president-elect by bundling money for his presidential campaign or opening their own wallets to him.”

#### **Five CAP Fellows at the Center of “the green”**

More relevant to green corruption is that this lengthy list provides us with some familiar

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members operating inside this clean-energy scam, which of course, were also bundlers for Obama's 2008 campaign — [even bundling again](#) in 2012. Even though, in October 2013, I gave insight into the Obama-Biden Transition Team and the numerous green energy players, here's an overview with the CAP fellows marked with asterisks:

1. Valerie B. Jarrett (Obama bundler): Obama-Biden Transition Project Co-Chair
2. \*John Podesta (Obama bundler): Obama-Biden Transition Project Co-Chair /Now "Executive Power Czar"
3. \*Carol M. Browner (Obama bundler): Advisory Board Member and Energy Policy Working Groups / Was promoted to Climate Czar, from January 2009 until February 2011
4. Michael Froman (Obama bundler): Advisory Board Member
5. TJ Glauthier (Obama bundler): Executive Office of the President
6. Lisa Jackson (Obama bundler): Energy and Natural Resources Team Leads
7. David Sandalow (Obama bundler): Energy Policy Working Groups
8. \*Steve Spinner (Two-time Obama bundler): Technology, Innovation & Government Reform Policy Working Groups / Was promoted to GOVT Advisor in April 2009 until September 2011
9. Tom Wheeler (Two-time Obama bundler): Working Group Members; Science, Tech, Space and Arts Team Leader
10. Heather Zichal (Obama bundler): Energy Policy Working Groups

Add to this list two more CAP fellows: Lawrence Summers, who, in late 2008 (until 2011), [became](#) President-elect Obama's Director of the National Economic Council and Van Jones, who in March 2009, [was appointed](#) as a special adviser for green jobs for the Obama White House, until he resigned in September 2009. This means that we have five CAP fellows that I'll profile below.

Obviously, operatives from this team were rewarded with positions inside the Obama White House, while others in 2009, snagged other key green energy roles. My focus has been on the "GOVT Insiders" — those from Obama's "[Green Team](#)" and his Energy Department [officials](#) and advisors, which included its fair share of Al Gore disciples and well-connected [Venture Capitalists](#). There has been a dozen on my radar that are either directly connected to tens of billions of green-



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1 government subsidies (loans, grants and special tax breaks), or helped their friends secure the funds.

2 Ironically, [many have fled](#) since their 2009 appointments, but it's worth noting that the  
3 "GOVT Dirty Dozen," under Energy Secretary Stephen Chu, includes Carol Browner (1), Lisa  
4 Jackson, Van Jones (2), Steve Isakowitz, Steve Spinner (3), Matt Rogers, Jonathon Silver (4), Cathy  
5 Zoi (5), Kristina Johnson (6) and others like James Markowsky (7), Steven Westly (8), Sanjay  
6 Wagle (9), David Danielson (10), David Sandalow (11), David Prend (12) — another piece of this  
7 scandal currently in the works.

8 What's telling is that these GOVT Insiders were part of the decision making process, even  
9 as the rest had access influence in one way or another. They were in charge of picking winners and  
10 losers, especially in regards to the Energy Department's multi-billion Loan Guarantee Program,  
11 mentioned many times in this post, whereas I have personally been tracking since 2010.

12 What we find is that many of those operating inside the Energy Department had more  
13 sinister roles and were using tactics such as lobbying, pressure, collusion, and coercion. The  
14 evidence of this started circulating in 2011, when the Solyndra Saga broke, but worse, was  
15 confirmed in many of the GOVT email exchanges released to the public since that time, which  
16 includes the massive "2012 Internal GOVT Email Dump" that was unleashed in late October of that  
17 year.

18 These correspondences [basically prove](#) that the president, the White House, Secretary Chu,  
19 and certain GOVT officials lied about how they handled the green energy loans on various fronts —  
20 which was followed by secrecy, cover-ups and even perjury.

21 In November 2012, Marita Noon and I [began unleashing](#) the content of these email  
22 interactions, of which we found plenty of references to the president, POTUS, the White House, the  
23 "7th floor," and "the Hill." More disturbing is that contrary to House Oversight testimonies by  
24 GOVT officials, those inside the GOVT were rushing the approval of the GOVT loans — a fast  
25 track process imposed at the POTUS level, yet they were met with resistance by the Treasury as  
26 well as the Office of Management and Budget ([OMB](#)), amongst others involved in the deal making  
27 process.

28 As it turns out, these emails reveal that many of the GOVT loans were rushed and approved



1 for political reasons — visits, speeches, announcements, photo ops, and talking points for the  
2 president as well as for the purpose of helping those connected to the companies seeking the loans  
3 — CEO's, investors, and Democrat politicians, which goes beyond [subsidizing Nevada companies](#)  
4 in order to help Senate Majority Leader Harry Reid win his 2010 reelection campaign.

5 These bombshell emails also expose the cozy relationships GOVT officials and advisors had  
6 during the loan review process with loan applicants and their CEO's, lobbyists, and investors, etc.  
7 It's no surprise that they had meetings and calls with GOVT officials and Energy Secretary Chu, but  
8 there are documented meetings and calls with the president, VP, and WH as well as plenty of "green  
9 fraternizing" going on — bike riding, coffee meetings, sleepovers, "beer summits," Al Gore parties,  
10 dinners, Democrat fundraisers, and so on.

11 **NOTE:** "2012 Internal GOVT Email Dump" is in reference to the House Oversight huge  
12 document dump that was [unleashed](#) in October 2012 (see [Memorandum](#), [Appendix I](#) and the [350+](#)  
13 [page Appendix II](#)), and due to its value, will be sourced many times in this report.

14 Today we'll stay focused on Center for American Progress, starting with the fact that other  
15 than John Podesta, we have Valerie B. Jarrett: President's Obama's longest serving advisor and  
16 confidante, of which some refer to her as the "[shadow chief of staff](#)."

17 While Podesta is directly tied to CAP, Ms. Jarrett has an indirect connection: Prior to joining  
18 the Obama administration as [Senior Advisor](#) and assistant to the president, she [served as](#) Vice  
19 Chairman of The [Joyce Foundation](#) (Obama sat on the board 1994 to 2002), the Chicago-based  
20 organization, who is a major donor to radical environmentalist and conservation groups [as well as](#)  
21 progressive movements like CAP.

22 This was part of the climate scam that not involves many green corruption suspects, but  
23 leads to [cap-and-trade](#), of which I began to [unravel](#) in 2010, and [what I refer to](#) as the "pot of gold at  
24 the end of the climate rainbow" — warning that with so much at stake, even if the planet blows up,  
25 they will get their cap-and-trade, or a version of it.

26 Jarrett, also in September 2009, hosted a "[Clean-Energy Summit](#)" where an array of  
27 attendees just so happened to "collectively strike gold" with over \$5.3 billion in taxpayer funds  
28 from the Green Bank of Obama. We also know that internal emails showed (released in 2011) that

[deliberations on Solyndra](#) — the first GOVT loan to go bad and scream corruption — “reached into Obama’s inner circle, including senior adviser Valerie Jarrett and former chief of staff Rahm Emanuel.”

Additionally, we can confirm via the “2012 Internal GOVT Email Dump” that Ms. Jarrett had a December 7, 2010, meeting with “the CEO’s of NRG and Reliant.” NRG Energy (a Fortune 500 and S&P 500 Index company) and its subsidiaries (Reliant is one) [was the recipient](#) of most of junk-rated stimulus loans, which includes NRG Solar for the Agua Caliente project (\$967 million); NRG Solar for the California Valley Solar Ranch (\$1.2 billion); BrightSource Energy Ivanpah project (\$1.6 billion); and Prologis for Project Amp (\$1.4 billion).

NRG Energy is one of those twelve timely Soros investments that I alluded to earlier (along with additional Obama administration connections) that snagged \$5.2 billion in loans and a truck load of grants as well as other cleantech funds from the Green Bank of Obama. But it is the highly paid [president and CEO](#) (since 2003) David Crane ([stock owner](#) and an [aggressive pusher](#) of clean energy) who appeared to have significant influence. [During the course](#) of the June 2012, House Oversight hearing, Crane admitted that between the Bush administration and the Obama administration, he had visited the White House “14 to 15 times,” of which 6 to 7 of his visits were with the Obama White House.

**Lawrence Summers: Currently listed as a Distinguished Senior Fellow at Center for American Progress and mentor to Facebook boss Sandberg**

- Former Director of President Obama’s National Economic Council ([designated](#) on November 24, 2008 to 2011)
- Former Secretary of Treasury under President Bill Clinton (from [1999 to 2001](#))

It’s worth noting that back in the day (November 2008), President-elect Barack Obama rolled out his National Economic Council (NEC), and installed “economic czar” [Larry Summers](#) (not subject to pesky confirmation hearings), who had served as Robert Rubin’s [protégé](#) at Treasury. Rubin, on the other hand, who had spent 25 years at Goldman Sachs before serving as Secretary of Treasury under the Clinton administration ([1995-1999](#)), after his government stint went to Citigroup as a [Senior Counselor](#), only to retire in January 2009. However, what’s not widely

1 known is that behind the scenes [during Timothy Geithner's time at Treasury], "Rubin was still  
2 wielding enormous influence in Barack Obama's Washington," [documented](#) POLITICO.

3 What's worth pointing out again is that Summers' private memos to Obama, which were  
4 released by [The New Yorker](#) in early 2012, revealed the real intent behind the economic stimulus  
5 bill. American Enterprise Institute [reported](#), "A key source for writer Ryan Lizza is a [57-page,](#)  
6 ["Sensitive & Confidential" memo](#) written by economist Summers to Obama in December 2008,"  
7 which exposed "11 stunning revelations from Larry Summers' secret economics memo to Barack  
8 Obama." One in particular was that the stimulus was about implementing the Obama agenda and  
9 rewarding his green cronies.

10 The short-run economic imperative was to identify as many campaign promises or high  
11 priority items that would spend out quickly and be inherently temporary. ... The stimulus package  
12 is a key tool for advancing clean energy goals and fulfilling a number of campaign commitments.

13 Summers, a [Distinguished Senior Fellow](#) at CAP, has significant ties to Wall Street, which if  
14 you've been paying attention, they ensured an Obama victory in 2008. [Prior](#) to Summers heading to  
15 the Obama White House as top economic advisor, he had an [elaborate gig](#) where he worked just one  
16 day a week while making \$5.2 million in two years at D.E. Shaw — a New York-based [\\$39 Billion](#)  
17 [Hedge Fund Giant](#). [According to](#) the *Wall Street Journal*, Summers "received hundreds of  
18 thousands of dollars in speaking fees from major financial institutions," which included "frequent  
19 appearances before Wall Street firms including J.P. Morgan, Citigroup, Goldman Sachs and  
20 Lehman Brothers."

21 What's significant is that both Goldman Sachs and Citigroup (profiled later) are corporate  
22 CAP donors that either won billions in green energy funds, or made money off of the deals that  
23 occurred. And, the majority of the deal making came from the now \$32 billion Energy Department  
24 [Loan Guarantee Program](#), with the majority of the loans awarded and finalized between 2009 and  
25 September 2011. This is the same program that, as mentioned earlier, has been pushed and  
26 promoted by Center for American Progress for some time.

27 During Summer's time inside the Obama White House, it's unclear how involved Summers  
28 was in the loan program decision making process, but we can confirm via the "2012 Internal GOVT

Email Dump” that he was part of a scheduled January 2010 meeting with Jonathan Silver (head of the Loan Program at the time), a few GOVT officials, and Carol Browner — the latter another CAP fellow that will be profiled next.

“Nearly a year before [Solyndra](#) went bankrupt and engulfed the White House in scandal, President Obama’s top economic advisors [Summers and Timothy Geithner] warned him about the risks of the clean-energy loan program that granted the solar company more than a half-billion dollars” — [as reported](#) by the Business Insider in September 2011.

Needless to say, Solyndra was only one of the [22 “junk” loans](#) awarded by the Energy Department’s \$16 billion stimulus program — a program where we find that Summers is directly tied to one of those GOVT deals, while his buddy David Shaw, a two-time Obama bundler, had an invested interest in more.

Mr. Shaw is the founder of D.E. Shaw, where Summer’s worked before joining the Obama White House, and a firm that is connected to at least two renewable energy companies that snagged billions in GOVT stimulus loans: First Wind and First Solar that are also CAP corporate donors, which will be expanded upon later. First Wind was the winner of a \$117 million GOVT stimulus loan, plus hundreds of millions in stimulus grants, of which, [according](#) to Peter Schweizer, “Larry Summers was part owner of First Wind.” Meanwhile, First Solar won three large stimulus loans, totaling over \$3 billion of taxpayer money — not to mention additional green energy funds.

**Carol M. Browner:** *Founding member of Center for American Progress and currently a Senior Fellow*

- Currently on the Advisory Committee of the export-Import Bank of the United States
- Headed the Office of Energy and Climate Change Policy (AKA Climate Czar), from January 2009 until February 2011
- Obama-Biden 2008-Transition Team role: Advisory Board Member and Energy Policy Working Groups
- 2008 Obama Bundler

[Browner](#), a career Washington insider, who directed the Environmental Protection Agency (EPA) during the Clinton administration, is an Al Gore acolyte, and an [environmental extremist](#)

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1 with a few left-wing radical ties on her secret resume. While Browner worked for Gore as far back  
2 as 1988, at some point (between 2007 and 2009), [she served](#) as a board member of the Gore's  
3 Alliance for Climate Protection — which, in July 2011, was morphed into "[The Climate Reality](#)  
4 [Project](#)." From what I gather, this was the result of merging two environmental groups: The  
5 Alliance for Climate Protection and The Climate Project, which were both founded in 2006 by Al  
6 Gore.

7 Browner was also a 2008 Obama bundler and part of the Obama-Biden Transition Team,  
8 who was later appointed to the president's 2009 [Green Team](#) as the "climate czar," only to [abruptly](#)  
9 [resign](#) in early 2011.

10 Prior to her tenure at the Obama White House, Browner was a founding board member  
11 (from 2003-2008) for CAP, and she is currently listed as a [Senior Fellow](#). Browner, [not only](#)  
12 "pushed for billions of dollars for renewable energy in the economic stimulus bill," she was part of  
13 the decision-making process inside the Energy Department's [Loan Guarantee Program](#), which at the  
14 time of her departure had doled out \$34.7 billion of taxpayer money. Browner [is implicated](#) in an  
15 array of issues surrounding these loans, as reflected in many of the GOVT email exchanges released  
16 to the public since 2011, as well as the "2012 Internal GOVT Email Dump."

17 With such deep connections to the former-Vice President Al Gore, and his climate mission,  
18 one wonders why Gore and his investment firms — Kleiner Perkins and Generation Investment  
19 Management — raked in so much of the GOVT money under her watch. As of January 2013, I  
20 tracked that these two firms combined are tied to at least \$10 billion (more if you add in Silver  
21 Spring Networks and the fact that their "customers" raked in \$1.3 billion in smart-grid stimulus  
22 grants), from the taxpayer-funded Green Bank of Obama, the majority coming from the 2009-  
23 Recovery Act — the stimulus bill (renewable energy part) that Doerr helped author, while Browner  
24 pushed to include taxpayer money.

25 Browner may have left her "climate" post, but she currently sits (and has for a while) on the  
26 Advisory Committee of the export-Import Bank of the United States (Ex-Im), another means where  
27 Plaintiffs government dishes out billions of American taxpayer dollars in support of clean energy.

28 "The Ex-Im Bank uses [taxpayer money](#) to backstop politically favored projects, which "just

greases the wheels of the powerful and often corrupt big Washington Establishment,” wrote Heritage Action. This is another “green bank” that not only supports [other Nations](#), but where you’ll find corporate welfare and crony capitalism run amok, which includes quite a number of the president’s favored firms: Abengoa, First Solar (Exelon Corp.) and SolarWorld, to name a few.

As [recently as](#) October 2013, at a [Washington, D.C. CAP event](#) (10th anniversary policy conference), Browner had this to say about the Keystone Pipeline: “There will be some twists and turns” in the political debate over the pipeline, but “at the end of the day [Obama] is going to say no,” [reported](#) the Huffington Post.

( [https://www.huffingtonpost.ca/2013/10/25/carol-browner-keystone-obama\\_n\\_4164156.html?just\\_reloaded=1](https://www.huffingtonpost.ca/2013/10/25/carol-browner-keystone-obama_n_4164156.html?just_reloaded=1) )

( <https://www.americanprogress.org/events/2013/10/23/77992/caps-10th-anniversary-policy-conference/> )

( [https://www.huffingtonpost.ca/2013/10/25/carol-browner-keystone-obama\\_n\\_4164156.html?just\\_reloaded=1](https://www.huffingtonpost.ca/2013/10/25/carol-browner-keystone-obama_n_4164156.html?just_reloaded=1) )

This was an even that besides Browner, featured other Big Green personalities such as Van Jones, Tom Steyer, John Podesta, Treasury Secretary Jack Lew, Secretary of State John Kerry, California Governor Jerry Brown, Chicago Mayor Rahm Emanuel, and of course, Al Gore.

**Tom Steyer, CAP Board Member and Donor, Climate Change Radical, Big Oil Investor, Obama Bundler, Margie Sullivan’s partner and Billionaire Buddy of all the Tech Oligarchs**

At that event, Browner was [joined on a panel](#) with Van Jones, the former “green jobs czar” — also a CAP fellow (profiled next) — along with environmental advocate Tom Steyer, who has been on an [anti-Keystone XL crusade](#) for some time.

( [https://www.huffingtonpost.ca/2013/10/25/carol-browner-keystone-obama\\_n\\_4164156.html?just\\_reloaded=1](https://www.huffingtonpost.ca/2013/10/25/carol-browner-keystone-obama_n_4164156.html?just_reloaded=1) )

( [https://www.huffingtonpost.ca/2013/10/04/tom-steyer-keystone-harper\\_n\\_4044667.html](https://www.huffingtonpost.ca/2013/10/04/tom-steyer-keystone-harper_n_4044667.html) )

In fact, Jones has been on the record [slamming](#) the president’s delay on denying the pipeline.

( <https://www.cnn.com/2013/05/30/opinion/jones-obama-keystone-pipeline/index.html> )

Meanwhile, Steyer is the same hedge-fund billionaire and megabucks Obama bundler and

Democrat donor that was also a Big Oil Investor through his former firm Farallon Capital Management that has an [invested interest](#) in the rejection of the pipeline.

( <https://www.humanevents.com/2013/06/27/green-is-the-color-of-corruption/> )

Like most prominent Obama fundraisers, Steyer has enjoyed relatively easy access to the White House, and as of the summer of 2012, it was reported that he had met with senior White House officials in the West Wing on at least four occasions. Steyer was even handpicked to make a [cameo appearance](#) at the [2012](#) Democratic National Convention.

( <https://greencorruption.blogspot.com/2012/09/obamas-green-cronies-made-dnc-cameo.html#.UwvejCiRnzI> )

Additionally, Steyer, “plans to spend as much as \$100 million during the 2014 election, seeking to pressure federal and state officials to enact climate change measures through a hard-edge campaign of attack ads against governors and lawmakers,” [reported](#) the *New York Times* last month.

( [https://www.nytimes.com/2014/02/18/us/politics/financier-plans-big-ad-campaign-on-environment.html?\\_r=1](https://www.nytimes.com/2014/02/18/us/politics/financier-plans-big-ad-campaign-on-environment.html?_r=1) )

In September 2012, the *Washington Free Beacon* [documented](#) that Steyer “is [reportedly](#) one of the backers of [Greener Capital](#), which invests in alternative fuel companies that benefit from the anti-oil policies of the Obama administration.

( <https://freebeacon.com/the-one-percent-gets-its-turn/> )

( <https://green.blogs.nytimes.com/2011/03/15/a-foil-for-the-koch-brothers/> )

( <https://www.greenercap.com/index.php> )

” What’s key to this Green Corruption file is that “Steyer has donated at least \$1.4 million to the Center for American Progress (CAP) since 2009 through his TomKat Charitable Trust. As of 2010, he was listed as a director of the left-wing think tank.”

In December 2013, The Beacon, in their piece “[Keystone to the Kingdom](#),” we find a stunning look at the relationship between Mr. Steyer and John Podesta:

( <https://freebeacon.com/keystone-to-the-kingdom/> )

“[Steyer](#) is on the board of the Center for American Progress, and in the early months of 2012 he and Podesta cosigned a *Wall Street Journal* op-ed, “[We Don’t Need More Foreign Oil and Gas](#),”



( <https://climatesolutions.org/donate/climate-solutions-5th-annual-breakfast/tom-steyer> )  
( <https://online.wsj.com/news/articles/SB10001424052970203718504577178872638705902>  
)

arguing against Keystone and for tax loopholes such as the Production Tax Credit, increasing the value of the green energy companies in which Steyer invested and on whose boards Podesta sat.”

Moreover, while a slew of Democrats who oppose the Keystone XL pipeline, [stand to benefit](#) from its rejection, Farallon Capital Management “has extensive holdings in fossil fuel companies

( <https://washingtonexaminer.com/who-gets-rich-off-of-blocking-the-keystone-xl-pipeline/article/2543928> )

— including investments that could benefit from the blocking of the Keystone pipeline,” [reported](#) *The Daily Caller* in May 2013.

( <https://dailycaller.com/2013/06/20/top-anti-keystone-activist-could-benefit-from-blocking-pipeline/> )

One in particular stands out: “Farallon also still holds stock in BP” — the oil giant that [according to](#) *POLITICO* in 2010, Obama was the biggest recipient of BP donations over the past twenty years.”

( <https://www.politico.com/news/stories/0510/36783.html> )

In case you didn’t know, British Petroleum, the oil and gas giant that in 2001, began rebranding to Beyond Petroleum (BP), was heavily in the “green” business via [BP Alternative Energy](#) (biofuels, wind and solar). However, in the spring of 2013, BP switched gears and started [abandoning](#) renewable energy.

( <https://finance.townhall.com/columnists/maritanoon/2013/04/07/smart-money-abandoning-renewable-energy-n1560319/page/full> )

Still, that was after BP had snagged millions in “green” funds from the Obama administration, of which I [began to unravel](#) in April 2013 due the fact that BP is in cahoots with Sempra Energy, the winner of a \$337 million GOVT stimulus loan for the Mesquite Solar Project in



1 Arizona.

2 ( [https://greencorruption.blogspot.com/2013/04/newly-bankrupt-chinese-solar-](https://greencorruption.blogspot.com/2013/04/newly-bankrupt-chinese-solar-producer.html#.UvZU3yiRnzL)  
3 [producer.html#.UvZU3yiRnzL](https://greencorruption.blogspot.com/2013/04/newly-bankrupt-chinese-solar-producer.html#.UvZU3yiRnzL) )

4 Also, BP, at that time, was part of [all five](#) of Sempra's wind projects.

5 ( <https://www.semprausgp.com/energy-solutions/wind-projects.html> )

6 BP Alternative Energy is also an [investor](#) in BrightSource Energy — the winner of a [\\$1.6](#)  
7 [billion GOVT stimulus loan](#) that involves more CAP corporate donors and a slew of additional  
8 Obama cronies that I'll get to much later.

9 ( <https://www.brightsourceenergy.com/investors#.UvZVNCiRnzI> )

10 ( <https://lpo.energy.gov/projects/brightsource-energy-inc/> )

11 **Van Jones: Senior Fellow at Center for American Progress (it is unknown when Van first**  
12 **joined CAP, but we do know that he [rejoined](#) in February 2010)**

- 13 • Green Jobs Czar, from March 2009 to September 2009  
14 • 2008 to 2009 Crafter of the Recovery Act: both personally and via the Apollo  
15 Alliance, as part of their National Steering Committee, where Van Jones was a board  
16 member from 2006 to either 2008 or 2009

17 As the story goes, Van Jones — [left-wing radical](#), turned CNN contributor — was  
18 handpicked to become Obama's "green jobs czar" in 2009:

19 ( <https://www.wnd.com/2009/08/106653/> )

20 "We were so delighted to be able to recruit him into the White House," Senior Advisor  
21 Valerie Jarrett, stated on August 12, 2009. Mr. Jones' advisory post at the White House was short  
22 lived due to his radical past and behavior, and in September 2009 he resigned, [blaming](#) it on a  
23 "smear campaign of lies and distortions to distract and divide."

24 ( <https://thinkprogress.org/politics/2009/09/06/59506/van-jones-resigns/> )

25 Nevertheless, Van is another very active CAP member where his focus remains on "green-  
26 collar jobs." He's still a strong force in the midst of the climate change debate, pushing green jobs,  
27 as well as his [extreme](#) environmental ideology.

28 ( <https://www.rebuildthedream.com/> )

1 Since 2010, Jones has been a [Senior Fellow at CAP](#), whereas his bio states, “he is a co-  
2 founder of three successful nonprofit organizations: the Ella Baker Center for Human Rights, Color  
3 of Change, and Green For All” — of which both George Soros and Al Gore (both huge winners of  
4 green energy monies) have been know to [fund](#) Van’s causes as far back as the 90’s, including Green  
5 for All.

6 ( <https://www.americanprogress.org/about/staff/jones-van/bio/> )  
7 ( [https://epaabuse.com/537/watermelon-patch/van-jones-is-the-ultimate-watermelon-green-  
outside-red-inside/](https://epaabuse.com/537/watermelon-patch/van-jones-is-the-ultimate-watermelon-green-<br/>8 outside-red-inside/) )

9 Mr. Jones has been featured in a few of my posts, but most recently when I exposed the  
10 various green parties involved in crafting the energy sector of the 2009-Recovery Act — and how  
11 they and their friends raked in tens of billions from the Green Bank of Obama. Certainly, Van’s  
12 White House post, which comprised of overseeing billions in “green” stimulus funds, and the  
13 subsequent controversy surrounding his eco-radical mission (good and bad press) helped catapult  
14 Jones into fame and possibly some fortune. In my opinion, this would include the success of his  
15 green jobs book, [numerous](#) green honors, and his CNN gig — success that he may not have seen  
16 otherwise.

17 ( <https://www.vanjones.net/about> )

18 We’ve tracked Jones’ connections to CH2M HILL (also a client of the Podesta Group), the  
19 winner of \$1.3 billion in stimulus funds as well as Solar Mosaic, where Jones was an advisor, who  
20 ultimately, in June 2012, was [awarded](#) a \$2 million grant from the Energy Department’s [SunShot](#)  
21 [Initiative](#). Solar Mosaic had also [employed](#) Rebuild the Dream to do its public relations work,  
22 [documented](#) the *Daily Caller* in 2012. Also, in 2012 and 2013, Solar Mosaic snagged two small  
23 1603 federal stimulus grants: one in Arizona for \$13,123 and in California for \$185,700.

24 What about Mr. Jones’ *solicitation* business? Prior to Van’s resignation, in August 2009, his  
25 Green for All [launched](#) a program called [Capital Access Program](#) (CAP) to help green businesses  
26 secure stimulus funds — monies that he was overseeing at that time, of which [his bio](#) confirms. In  
27 fact, during the 2012 presidential election (as a [CNN contributor](#)), Jones bragged about his part in  
28 the implementation of the clean-energy stimulus funds: he helped “run the inter-agency process that

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oversaw \$80 billion [some [reports](#) go as high as \$100 billion] in green energy recovery spending.”

What’s also relevant is that not only did Jones personally participate in the formation of 2009-Recovery Act, he was with the Apollo Alliance as part of their National Steering Committee and Board member (from 2006 to either 2008 or 2009) — when the Apollo Alliance successfully got many of their policy ideas packaged into the stimulus bill, including, but not limited to, its expensive and unsuccessful “green jobs” program.

Both Senator Harry Reid and Mr. Jones have bragged about the Apollo’s participation. Adding to the mix is that the Apollo Alliance is a project of the Tides Center. And, the Tides Center/ Tides Foundation is another Soros funded left-wing organization that was also funded by the [Joyce Foundation](#), mentioned earlier under Valerie Jarrett.

( <https://www.discoverthenetworks.org/funderprofile.asp?fndid=5310&category=79> )

What you should know about the Tides Center can be found at [Watchdog.org](#), who in 2013, labeled their programs as “a checklist of liberalism’s most ambitious agenda.” Moreover, it’s become a meeting place of two potentially warring factions of the Left — labor and environmentalists,” charged [Tori Richards](#) early last year.

( <https://watchdog.org/> )

( <https://watchdog.org/72855/tides-uses-tax-dollars-to-turn-america-to-the-left/> )

Richards [continues](#)....

( <https://watchdog.org/72855/tides-uses-tax-dollars-to-turn-america-to-the-left/> )

Perhaps Tides’ biggest coup was using its Apollo Alliance Project to help draft Obama’s massive stimulus bill. The final stimulus bill doled out billions of dollars to further the Left’s green-energy agenda and social justice constituency while preserving labor’s role in centralized economic planning.

Apollo Alliance, now labeled as the [BlueGreen Alliance](#), not only enjoys political clout, but they also have significant and highly influential [green allies and donors](#), which at one point included John Podesta as an Apollo board member — adding another layer to CAP’s power behind this massive green energy scheme.

( <https://www.bluegreenalliance.org/apollo> )

1 ( [https://keywiki.org/index.php/Apollo Alliance#cite\\_note-6](https://keywiki.org/index.php/Apollo_Alliance#cite_note-6) )

2 **Steve Spinner: Senior Fellow at the Center for American Progress from September 2010**  
3 **to October 2011, where he publicly advocated for energy policies that support clean, renewable**  
4 **energy**

- 5 • Two-time Obama Bundler
- 6 • GOVT Loan Programs Advisor, from April 2009 to September 2010
- 7 • 2008 Obama-Biden Transition Team role: Technology, Innovation & Government
- 8 Reform Policy Working Groups

9 Steve Spinner, a two-time Obama bundler, not only worked for Obama's 2008 transition  
10 team, he also was part the president's 2012 reelection campaign, serving as a California finance  
11 chair and founded "Technology for Obama (T4O)." His wife was Solyndra's lawyer.

12 In April 2009, [Spinner](#) was appointed as the GOVT Loan Programs Advisor to then-Energy  
13 Secretary Steven Chu, yet by September 2010, he left the GOVT and about that same time joined  
14 CAP as a Senior Fellow [until October 2011](#).

15 ( <https://energy.gov/articles/fact-check-steve-spinner> )

16 ( <https://www.politico.com/news/stories/1011/66287.html> )

17 During the course of [Spinner's](#) GOVT gig, he acted as a liaison between the Recovery Act  
18 Office and the Loan Programs Office, of which he was responsible for monitoring the loan program.  
19 According to the GOVT, "In that capacity, [Spinner] played no role in the decision-making on or  
20 evaluation of individual loan applications or the awarding of any grants."

21 ( <https://energy.gov/articles/fact-check-steve-spinner> )

22 Spinner was also handpicked to make a [cameo appearance](#) at the [2012](#) Democratic National  
23 Convention, along with other wealthy Obama green cronies: Steve Westly, Tom Steyer (profiled  
24 earlier) and Jim Rogers, who will be profiled later.

25 ( [https://greencorruption.blogspot.com/2012/09/obamas-green-cronies-made-dnc-](https://greencorruption.blogspot.com/2012/09/obamas-green-cronies-made-dnc-cameo.html#.UwvejCiRnzI)  
26 [cameo.html#.UwvejCiRnzI](https://greencorruption.blogspot.com/2012/09/obamas-green-cronies-made-dnc-cameo.html#.UwvejCiRnzI) )

27 ( <https://www.demconvention.com/> )

28 **Spinner & Solyndra**

1 Spinner is well known for his [involvement](#) and influence (investigations [and](#) internal emails  
2 prove) to the ill-fated, politically connected Solyndra, which was once the [poster child](#) for the  
3 president's clean-energy initiative.

4 ( <https://www.politico.com/news/stories/1011/65448.html> )  
5 ( [https://abcnews.go.com/Blotter/obama-fundraiser-pushed-solyndra-deal-inside/story?  
6 id=14691618#.UFZk7BjdtJM](https://abcnews.go.com/Blotter/obama-fundraiser-pushed-solyndra-deal-inside/story?id=14691618#.UFZk7BjdtJM) )

7 ( [https://www.youtube.com/watch?v=0J6h1PcVQp8&feature=player\\_embedded](https://www.youtube.com/watch?v=0J6h1PcVQp8&feature=player_embedded) )

8 The Solyndra Saga — FBI raid and all — in 2011, morphed into the template for Obama's  
9 green corruption scandal: political payback, costing taxpayers at least \$570.4 million. Yet, most  
10 concluded a long time ago that Solyndra was only the tip of the iceberg.

11 Nevertheless, Spinner's participation, despite the GOVT's denial, has been proven many  
12 times over, including in October 2011, when [POLITICO](#) and others seized on his role inside this  
13 scandal, stating, "[Spinner] played an active part in Solyndra's \$535 million loan guarantee  
14 [[approved](#) in September 2009] despite conflict of interest concerns over his wife's work at a law  
15 firm that also represented the California solar company."

16 ( <https://www.politico.com/news/stories/1011/65448.html> )  
17 ( <https://lpo.energy.gov/Plaintiffs-projects/discontinued-projects/> )

18 Solyndra also [snagged](#) a \$25.1 million in California tax credit, and at some point before  
19 2011, Solyndra indirectly bagged another loan from the export-Import Bank, which was obtained by  
20 a third-party company to the tune of \$10.3 million.

21 ( [https://greencorruption.blogspot.com/2014/01/cleantech-crash-cbs-lesley-  
22 stahl.html#.UwkCwCiRnzI](https://greencorruption.blogspot.com/2014/01/cleantech-crash-cbs-lesley-stahl.html#.UwkCwCiRnzI) )

23 It should be emphasized that back in 2009, Fitch had rated the Solyndra GOVT loan "non-  
24 investment grade," [as revealed](#) by the Committee on Oversight and Government Reform in March  
25 2012 — a report that implicates Spinner even more so.

26 ( [https://oversight.house.gov/report/the-department-of-energys-disastrous-management-of-  
27 loan-guarantee-programs/](https://oversight.house.gov/report/the-department-of-energys-disastrous-management-of-loan-guarantee-programs/) )

28 White House e-mails released late last year [2011] indicate that Spinner was influential in

1 securing the \$528 million loan to now-bankrupt Solyndra. Many of those EMAILS were written just  
2 days after he signed an ethics agreement pledging that he would “not participate in any discussion  
3 regarding any application involving” his wife’s law firm.

4 In one message to a GOVT official on August 28, 2009, Spinner wrote, “**How hard is this?**  
5 **What is he waiting for? . . . I have OVP and WH breathing down my neck on this.**” The e-mail  
6 went on to demand that the GOVT official “**walk over there and force [the official working on**  
7 **the Solyndra evaluation] to give [him] an answer.**” After just being contacted by Solyndra,  
8 Spinner inquires in another e-mail, “**Any word on OMB? Solyndra’s getting nervous.**” The e-  
9 mail correspondence occurring in the final days before the Solyndra loan closed in September 2009  
10 centers heavily on Spinner’s efforts to coordinate plans for either the President or Vice President to  
11 announce the first loan approval at a scheduled visit to Solyndra.

#### 12 **Spinner & Tesla Motors**

13 Additionally, we know that prior to joining the GOVT, Spinner was an energy-focused  
14 venture capitalist and high-tech consultant. At some point, Spinner was a “[consultant](#)” to Tesla  
15 Motors, the “billionaire’s electric car company,” with an array of Obama pals in the mix (Elon  
16 Musk , [Steve Westly](#), Nicholas Pritzker, Google executives, Vantage Point Capital Partners and  
17 Goldman Sachs), of which in January 2010, was [subsidized](#) with \$465 million of taxpayer money  
18 from the GOVT’s ATVM program.

#### 19 **Spinner & First Solar**

20 Needless to say, according to *The Nation*’s May 2013 piece entitled “[The Secret Donors](#)  
21 [Behind the Center for American Progress and Other Think Tanks](#),” is where we first discover that  
22 First Solar was a huge favorite of CAP. [First Solar](#) is the solar firm, which is connected to a slew of  
23 Obama cronies, that is also a confirmed 2012 CAP corporate donor — [possibly](#) as early as 2011.

24 While we chronicled “[The First Solar Swindle](#)” in the summer of 2012, let me reiterate —  
25 although in more detail later — that they were awarded over \$3 billion in stimulus loans, as well as  
26 additional taxpayer money. One key tidbit of Intel from *The Nation* is where we learn of Spinner’s  
27 participation in the First Solar GOVT deal making....

28 Last year [2012], when First Solar was taking a beating from congressional Republicans and

1 in the press over job layoffs and alleged political cronyism, CAP's Richard Caperton praised  
2 Antelope Valley in his testimony to the House Committee on Energy and Commerce, saying it  
3 headed up his list of "innovative projects" receiving loan guarantees. Earlier, Caperton and Steve  
4 Spinner — a top Obama fundraiser who left his job at the Energy Department monitoring the  
5 issuance of loan guarantees and became a CAP senior fellow — had written an article cross-posted  
6 on CAP's website and its Think Progress blog, stating that Antelope Valley represented "the cutting  
7 edge of the clean energy economy."

8 The CAP article referenced above by Caperton and Spinner ("[Don't Let Clean Energy](#)  
9 [Funding Die on the Vine](#),") was published on July 13, 2011, and where we find that CAP demanded  
10 that more taxpayer money be used to fund the GOVT's loan program — even calling for a green  
11 bank "as a permanent financing tool for clean energy projects."

#### 12 **Spinner & Silver's Collusion**

13 The CAP piece referenced above also opened up another can of worms. Jonathon Silver, at  
14 that time an Obama administration official at the Energy Department "actively collaborated with  
15 CAP in 2011 to advance the president's green energy agenda, in possible violation of federal law,"  
16 [documented](#) the Washington Free Beacon on September 14, 2012.

17 This is where internal emails surfaced showing that over several days via Spinner and  
18 Silver's [personal email accounts](#) (correspondences that also imply the two were in touch multiple  
19 times over the phone), the two colluded: "In July 2011, Steve Spinner, then a senior fellow at the  
20 Center for American Progress (CAP), sought and received guidance from Jonathan Silver, executive  
21 director of the Department of Energy's (GOVT) loans program, regarding a CAP [editorial](#) urging  
22 Congress to expand funding for the program and permanently establish a Clean Energy Deployment  
23 Administration (CEDA), or 'green bank,' to further fund clean energy projects."

#### 24 **Spinner & BrightSource Energy**

25 Inside the "2012 Internal GOVT Email Dump," we also discover that as early as September  
26 2009, there was "strong push" by Silver, Spinner, and Matt Rogers (Senior Advisor to Energy  
27 Secretary Steven Chu from January 2009 until September 2010) to push through the \$1.6 billion  
28 BrightSource Energy deal.

1       **NOTE:** Jonathan Silver, reported to be an Obama bundler, has quite the impressive  
2 background.

3       As noted by [\*Barron's Magazine\*](#) (in 2010), Silver had been a managing partner at Core  
4 Capital Partners [and co-founder] in Washington. “Coincidentally, one of his colleagues there was  
5 Tom Wheeler, a 2008 Obama bundler” — mentioned under the Obama-Biden Transition Team.

6       ( <https://online.barrons.com/article/SB50001424052970203296004575352982133405348.html> )

7  
8       We also know that [\*Silver's wife\*](#) has served as financial director of the Democratic  
9 Leadership Council, and that the couple hosted a party to promote Al Gore's environmental  
10 advocacy group, the Alliance for Climate Protection. This party (fundraiser) surrounded [\*Silver's\*](#)  
11 [\*vetting process\*](#) (September 2009), in which he invited two key GOVT officials.

12       ( [https://mag.newsweek.com/2011/11/13/how-obama-s-alternative-energy-programs-](https://mag.newsweek.com/2011/11/13/how-obama-s-alternative-energy-programs-became-green-graft.html)  
13 [became-green-graft.html](https://mag.newsweek.com/2011/11/13/how-obama-s-alternative-energy-programs-became-green-graft.html) )

14       ( <https://freebeacon.com/den-of-cronies/> )

15       Silver was appointed as the Executive Director of the Loan Programs Office in November  
16 2009, and [\*resigned\*](#) in early October 2011, amidst the “Solyndra \$535 Million Saga”

17       ( [https://www.nytimes.com/2011/10/07/us/politics/jonathan-silver-quits-energy-dept-loan-](https://www.nytimes.com/2011/10/07/us/politics/jonathan-silver-quits-energy-dept-loan-guarantee-office.html)  
18 [guarantee-office.html](https://www.nytimes.com/2011/10/07/us/politics/jonathan-silver-quits-energy-dept-loan-guarantee-office.html) )

19       — even [\*testifying\*](#) in September 2011. Considering that there is much to be said about  
20 Silver's just shy of a two-year stint at the GOVT, we do know that it included helping Secretary  
21 Chu accelerate the loan review process.

22       ( [https://www.realclearpolitics.com/video/2011/09/14/](https://www.realclearpolitics.com/video/2011/09/14/dept_of_energy_no_reason_to_believe_we_were_misled_by_solyndra.html)  
23 [dept\\_of\\_energy\\_no\\_reason\\_to\\_believe\\_we\\_were\\_misled\\_by\\_solyndra.html](https://www.realclearpolitics.com/video/2011/09/14/dept_of_energy_no_reason_to_believe_we_were_misled_by_solyndra.html) )

24       In reading hundreds of pages from the “2012 Internal GOVT Email Dump,” it's evident that  
25 Silver aggressively pushed the loans through (fast tracked) as directed, influenced, and pressured by  
26 the POTUS, Vice President Joe Biden, the White House, the 7th Floor, and the Hill — and did so  
27 with arrogance, even as he was fraternizing with lose seeking the GOVT loans.

28       Despite his resignation, Silver has appeared before the House Oversight Committee twice



(July 2012 and September 2013), of which at that time there was a slew of emails proving cronyism and corruption that Silver had to answer to. This is where some of the most bombshell details emerged, starting with the fact that in the course of Silver’s testimony during the [July 18th Oversight hearing](#), it was revealed that he and other GOVT officials and advisors were using their personal email accounts to conduct Energy Department business.

( <https://oversight.house.gov/hearing/the-administrations-bet-on-abound-solar-assessing-the-costs-to-the-american-taxpayers/> )

Silver also made this [denial](#): “...as I say, almost nobody that I am aware of in the Loan Program even knew who the individuals were who had invested, either directly or indirectly into these companies.” Yet, we know this is a lie.

( <https://greencorruption.blogspot.com/2012/07/recent-oversight-hearing-reveals-shady.html#.UvfOEyiRnzI> )

In fact, we exposed this many times in the course of unleashing the “2012 Internal GOVT Email Dump,” which [began](#) shortly after their release — even discovering more clean-energy dirt along the way. We can confirm that Silver knew **exactly** who the investors were in the projects seeking Energy Department loans in **at least four** of the deals that were approved: BrightSource, Shepherds Flat, and Kahuka Wind, and Fisker Automotive for starters — all with deep ties to the Obama White House. We also know that Silver expedited some of these loans for presidential photo ops, as well as helping Senator Harry Reid’s 2010 midterm election.

( [https://finance.townhall.com/columnists/maritanoon/2012/11/04/busting\\_open\\_energys\\_den\\_of\\_deception/page/full](https://finance.townhall.com/columnists/maritanoon/2012/11/04/busting_open_energys_den_of_deception/page/full) )

During the September 10, 2013 House Oversight hearing on “[Preventing Violations of Federal Transparency Laws](#),” members questioned two of the most egregious offenders: Mr. Silver and Lisa Jackson the former head of the EPA mentioned early on as part of the Obama-Biden Transition Team.

( <https://www.youtube.com/watch?v=eshWKRPU38&feature=em-uploademail> )

Sadly, this hearing didn’t get much coverage except for [Paul Chesser](#) at the National Legal

1 and Policy Center, noting that this event “didn’t last long enough to get very deep.” However, what  
2 caught my attention was when Committee Republican Jim Jordan of Ohio grilled Mr. Silver “about  
3 his directives to keep messaging out of the public eye” as well as reading particular email  
4 exchanges that implicated Silver helping his buddies get GOVT loans. Also at issue were the loan  
5 program failures.

6 ( [https://nlpc.org/stories/2013/09/16/house-committee-grills-GOVT-loan-program-director-](https://nlpc.org/stories/2013/09/16/house-committee-grills-GOVT-loan-program-director-over-secret-emails)  
7 [over-secret-emails](https://nlpc.org/stories/2013/09/16/house-committee-grills-GOVT-loan-program-director-over-secret-emails) )

8 However, the most unbelievable attempt to conceal the truth came out at that time: The  
9 congressman then showed an email that was sent to the committee staff a couple of days prior to the  
10 hearing from Silver’s lobbyist (lawyer, it’s unclear) demanding, “Don’t direct any questions to Mr.  
11 Silver.” Silver denied knowing anything about THE request, but we never got to the bottom of it  
12 because the Ranking Member, Congressman Elijah Cummings stopped Jordon from going down  
13 that path due to confusion over attorney/client privilege, and that he and Committee Chairman  
14 Darrell Issa would be looking into that issue...” off the record.

15 **Center for American Progress Finally Reveals its Corporate Donors: At least 17 raking**  
16 **in tens of billions of tax dollars from the Green Bank of Obama**

17 While the left-wing think tank is a well-known favorite of billionaire George Soros, as well  
18 as other left-leaning ultra-rich donors, “the center does not disclose who finances its activities, a  
19 policy it is declining to change even as Mr. Podesta prepares to wield influence over the shape of  
20 the Obama administration,” [wrote](#) the *New York Times* in 2008.

21 ( [https://www.nytimes.com/2008/11/07/us/politics/07podesta.html?\\_r=4&ref=politics&](https://www.nytimes.com/2008/11/07/us/politics/07podesta.html?_r=4&ref=politics&) )

22 However, “after heavy pressure arising from CAP’s quasi-lobbying history. That scrutiny  
23 ratcheted up following the announcement that CAP founder John Podesta would be formally joining  
24 the Obama administration. Both Politico and the *New York Times* called for the donor list to meet  
25 the public eye,” [reported](#) *Breitbart News*.

26 ( [https://www.breitbart.com/Big-Government/2013/12/13/Center-American-Progress-](https://www.breitbart.com/Big-Government/2013/12/13/Center-American-Progress-corporations)  
27 [corporations](https://www.breitbart.com/Big-Government/2013/12/13/Center-American-Progress-corporations) )

28 So, on December 13, 2013, CAP “revealed that it’s funded by some of the country’s largest

1 and most powerful corporations, trade associations and lobbying firms,” [announced](#) *POLITICO*.

2 ( [https://www.politico.com/story/2013/12/center-for-american-progress-donor-list-](https://www.politico.com/story/2013/12/center-for-american-progress-donor-list-101140.html)  
3 [101140.html](https://www.politico.com/story/2013/12/center-for-american-progress-donor-list-101140.html) )

4 The donor disclosure [excluded](#) individuals and foundations, only giving insight into their  
5 corporate influence, leaving more darkness in its wake.

6 ( [https://freebeacon.com/donor-disclosure-by-center-for-american-progress-leaves-much-in-](https://freebeacon.com/donor-disclosure-by-center-for-american-progress-leaves-much-in-the-dark/)  
7 [the-dark/](https://freebeacon.com/donor-disclosure-by-center-for-american-progress-leaves-much-in-the-dark/) )

8 Moreover, it was reported that each of those listed ([58 donors](#)) has given the group more  
9 than \$10,000 in 2013, yet the exact amount was not disclosed.

10 ( <https://www.americanprogress.org/about/Plaintiffs-supporters/> )

11 CAP’s 2013 donor list “[contains](#) a myriad of massive corporations, including Apple Inc.,  
12 AT&T, Bank of America, BMW of North America, Citigroup, Coca-Cola, Discovery, GE,  
13 Facebook, Google, Goldman Sachs, PepsiCo, PG&E, the Motion Picture Association of America,  
14 Samsung, Time Warner Inc., T-Mobile, Toyota, Visa, Walmart and Wells Fargo” — many of which  
15 are part of this massive green energy scheme.

16 ( <https://www.americanprogress.org/about/Plaintiffs-supporters/> )

17 Still, *The Nation*, in their May 2013 piece “[The Secret Donors Behind the Center for](#)  
18 [American Progress and Other Think Tanks](#), released a [list](#) of CAP’s 2012 corporate donors —  
19 labeled “[American Progress Business Alliance Members](#),” which are charged fees:

20 ( [https://www.thenation.com/article/174437/secret-donors-behind-center-american-progress-](https://www.thenation.com/article/174437/secret-donors-behind-center-american-progress-and-other-think-tanks-updated-524)  
21 [and-other-think-tanks-updated-524](https://www.thenation.com/article/174437/secret-donors-behind-center-american-progress-and-other-think-tanks-updated-524) )

22 ( [https://thenation.s3.amazonaws.com/pdf/CAP\\_alliance\\_members\\_2012\\_2.pdf](https://thenation.s3.amazonaws.com/pdf/CAP_alliance_members_2012_2.pdf) )

23 ( [https://thenation.s3.amazonaws.com/pdf/CAP\\_alliance\\_members\\_2012\\_2.pdf](https://thenation.s3.amazonaws.com/pdf/CAP_alliance_members_2012_2.pdf) )

24 A confidential CAP donor pitch I obtained describes the Business Alliance as “a channel for  
25 engagement with the corporate community” that provides “the opportunity to...collaborate on  
26 common interests.” It offers three membership levels, with the perks to top donors (\$100,000 and  
27 up) including private meetings with CAP experts and executives, round-table discussions with “Hill  
28 and national leaders,” and briefings on CAP reports “relevant to your unique interests.”

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1 The Nation also divulged that CAP doesn't publicly disclose the members of its Business  
2 Alliance, but they "obtained multiple internal lists from 2011 showing that dozens of major  
3 corporations had joined." What's relevant here is that in 2011 the lists compiled by The Nation of  
4 "CAP's donors included Comcast, Walmart, General Motors, Pacific Gas and Electric, General  
5 Electric, Boeing and Lockheed" — with three confirmed winners of green energy funds.

6 So basically the donor list and the membership list are one in the same. And, what's even  
7 more interesting is how The Nations chronicles CAP's assets:

8 "After growing rapidly in its first few years, tax records show, CAP's total assets fell in  
9 2006 for the first time, from \$23.6 million to \$20.4 million. Assets started growing again in 2007  
10 when CAP founded the Business Alliance, a membership rewards program for corporate  
11 contributors, and then exploded when Obama was elected in 2008."

12 We know that CAP founded its Business Alliance (corporate donors) in 2007, but since we  
13 only have a hint of 2011, combined with lists for 2012 and 2013, the mystery remains. Missing are  
14 the corporate donors CAP enlisted from 2007 until 2011. When did these now public donors join  
15 CAP, and what was dollar amount of money that was given?

16 While I am about to dissect the corporations from these lists (2011 to 2013) that received  
17 green energy taxpayer money (loans, grants and special tax breaks), in full disclosure, the majority  
18 of the stimulus and non-stimulus clean-energy funds (\$150 billion through 2014) were doled out  
19 between 2009 and 2011. However, as I reported in the beginning of this post, "green" funds  
20 continue to flow, and the Obama administration wants billions more of taxpayer money to save the  
21 planet.

22 I hate to be redundant, but as you'll see, CAP's corporate donors are connected to many of  
23 the same projects and firms that we have documented in previous Green Corruption Files. This is  
24 due to the fact that meaningful political ties — Obama's bundlers (both in 2008 and in 2012), top  
25 donors, financiers, and green cronies — have surrounded the green energy money from the onset.  
26 However, considering that CAP players operated inside the Obama White House as well as the  
27 Energy Department — prior, during and after the money was doled out — this adds another layer of  
28 corruption behind the green energy deals.

At any rate, several of these corporations include Big Banks (even the “too-big-to fail”) that have benefited immensely from President Obama’s cleantech push. Even though many on Wall Street stood by the president in 2012, the majority sided with Mitt Romney. But that was after Obama enjoyed his fare share of Wall Street buddies who helped ensure his victory in 2008, poring millions of dollars into his campaign coffers, making their mark as TOP campaign donors (PAC) — with even Wall Street executives bundling huge sums of money for then-candidate Obama. Additionally, “the big bundlers had broad access to the White House for meetings with top administration officials and glitzy social events.”

Inside these CAP corporate donor lists we find a few TARP recipients such as Citigroup, Goldman Sachs, Bank of America, and Merrill Lynch. What’s more telling is the infiltration of so many Citigroup and Goldman Sachs executives operating (past and present) inside the Obama administration, even shaping his economic policy.

#### **CAP’S 2013 DONORS: Green energy money winners**

**#1) Bank of America** (now Bank of America Merrill Lynch — confirmed donor since 2012):

Both Bank of America and Merrill Lynch (Campaign Committee’s), from 2003 to 2008, supported Senator Obama. Meanwhile, Bank of America, a heavy hitter donor with major lobbying pull, plays both sides of the isle. But in 2008, this Big Bank put their money (PAC and individuals) on blue, including donating to candidate Obama.

In the final days of the GOVT loan program (September 2011), the GOVT awarded a partial guarantee of \$1.4 billion loan — another shady stimulus deal (“non-investment grade”) that was “personally championed” by then-Energy Secretary Steven Chu — for a project called Project Amp. Prior to the finalization of this GOVT transaction, in June 2011, Bank of America Merrill Lynch, Prologis and NRG Energy joined forces on Project Amp, which was “a four-year, \$2.6 billion project to place solar panels on rooftops in 28 states, one of the most ambitious clean-energy projects in recent years,” reported the Wall Street Journal.

The Journal goes on, “Bank of America Merrill Lynch unit will provide \$1.4 billion in loans for the project,” of which “the financing is part of Bank of America’s plan to put \$20 billion of

1 capital to work in renewable energy, conservation and other clean technologies that address climate  
2 change.”

3       However, by October 2013, the Energy Department pulled the plug on Project Amp, and  
4 according to POLITICO, Prologis never tapped into the \$1.4 billion. Still, along the way, Prologis  
5 did secure “a grant for \$68,000 for the purpose of “rent for warehouse space” under the Recovery  
6 Act.

7       While I have yet to do a complete analysis on Bank of America/Merrill Lynch and their  
8 renewable energy portfolio, there are additional firms or projects that this bank has backed that also  
9 received “green” taxpayer funds from the Obama administration.

#### 10       **NextEra Energy Wind Energy Assets**

11       Fist is NextEra, whose CEO Lewis “Lew” Hay, III was member of President Obama’s Jobs  
12 Council (from 2011 until 2013), that was awarded two large GOVT stimulus loans, as well as a  
13 slew of other green energy stimulus funds. This is part of the scheme that we’ve been documenting  
14 since the summer of 2012 (“Third Largest Recipient of GOVT Risky Loans”), and later in my  
15 January 2013 Big Wind Story.

16       But since Bank of America has invested in the wind side, what’s key here is this: NextEra  
17 was the biggest user of the wind energy production tax credit. In an analysis by John Fund of the  
18 National Review Online, he states...

19       Begun 20 years ago to spur the construction of wind-energy facilities that could compete  
20 with conventional fossil-fuel power plants, the tax credit [PTC] gives wind an advantage over all  
21 other energy producers. But it has mostly benefited conventional nuclear and fossil-fuel-fired  
22 electricity producers. The biggest user of the tax credit is Florida-based NextEra Energy, the  
23 nation’s eighth-largest power producer. Through skillful manipulation of the credits, NextEra from  
24 2005 to 2009 ‘paid just \$88 million in taxes on earnings of nearly \$7 billion,’ Businessweek reports.  
25 That’s a tax rate of just 1.25 percent over that period, when the statutory rate is 35 percent.

#### 26       **SolarCity**

27       Considering that the Podesta Group added SolarCity as a client in 2012, I highlighted the  
28 various political connections to this solar firm earlier, including billionaire players that received

1 taxpayer money for other green energy deals, such as Elon Musk, Nicholas J. Pritzker, and George  
2 Soros.

3 But what most don't know is that SolarCity was in line to get a stimulus loan from the  
4 GOVT for \$275 million. However, that deal — dubbed SolarStrong — fell apart due to the  
5 Solyndra “red flags” just prior to the loan program’s deadline in September 2011. A month later,  
6 SolarCity found a willing partner in Bank of America, which was followed by this official  
7 announcement: “SolarCity and Bank of America Merrill Lynch today announced that they have  
8 agreed to terms on financing for SolarStrong, SolarCity’s ambitious five-year plan to build more  
9 than \$1 billion in solar power projects for privatized U.S. military housing communities across the  
10 country.”

11 It should be noted that without government subsidies, SolarCity wouldn't be the success it is  
12 today: “SolarCity currently benefits from tax credits totaling as much as 30 percent of the cost of  
13 these systems,” noted Bloomberg. And, as I documented earlier, SolarCity, so far (and since 2009)  
14 has been subsidized with “green” through various stimulus funds, grants and federal tax breaks at  
15 the tune of \$514 million.

### 16 **SunPower**

17 Bank of America Merrill Lynch and SunPower have worked together since 2009. And this  
18 year they announced a \$220 million financing program for residential solar lease projects. In  
19 January 2010, SunPower Corp, the San Jose, Calif.-based designer and manufacturer of solar panels  
20 and systems, received four of the stimulus-enacted Section 48C Tax Credits totaling \$10.8 million.  
21 Then, despite SunPower’s well-known financial issues and the fact that it was under a shareholder  
22 suit alleging securities fraud and misrepresentations, just days (September 2011) before the 1705  
23 Loan Guarantee Program’s deadline (along with four other solar companies), this “non-investment”  
24 grade \$1.2 billion stimulus loan was approved — to support the construction of the California  
25 Valley Solar Ranch (CVSR) in San Luis Obispo County.

26 The conditional loan to SunPower was announced on April 12, 2011, and shortly thereafter  
27 (April 30, 2011), the French oil conglomerate Total committed to buying a \$1.37 billion controlling  
28 stake (60%) in SunPower Corp — a bailout that was confirmed in June 2011. Now, SunPower

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1 never directly got the cash, because on the final closing of the GOVT loan guarantee, they sold the  
2 California Valley Solar Ranch to NRG Energy. However, SunPower continued on as the developer  
3 and Bechtel as the primary contractor building the project.

4 Also, to date, SunPower Residential, in 2013 and 2014, snagged 34 federal stimulus grants  
5 from the 1603 Program for “solar electricity” that ranges across 12 states, totaling over \$86 million  
6 tax dollars.

7 Other than Bank of America, both SunPower and NRG Energy have additional meaningful  
8 political connections to President Obama and other high-ranking Democrats, of which we’ve  
9 documented a few times: First in my October 2012 report (troubled green energy projects) and then  
10 in my February 2013 analysis on Citigroup, another CAP donor that is up next, which is a huge  
11 player inside this “climate” scam. Lastly, due to the fact that NRG Energy, a Fortune 500 and S&P  
12 500 Index company, of which they and their subsidiaries, initially, were the recipient of most of  
13 1705 stimulus loans: at least \$5.2 billion of taxpayer money (now minus the \$1.4 billion for Project  
14 Amp). NRG Energy was one of George Soros’ timely investments that I mentioned at the beginning  
15 of this post, yet more Intel can be found in my March 2013 Green Corruption File.

16 #2) Citigroup (confirmed donor since 2012):

17 Since 2007, Citigroup has been heavily involved in “climate change activities.” We also can  
18 confirm that this “too-big-to-fail” bank has made a massive footprint inside President’s Obama’s  
19 clean-energy dirt — the candidate that Citigroup helped get elected in 2008 as the number seven top  
20 donor (PAC) with many executives and friends of Obama bundling for both his campaigns.  
21 Meanwhile, in 2012, Citi contributed to both President Obama and Mitt Romney.

22 By 2011 — prior to the presidential reelection — through their “50 Billion Climate Change  
23 Investment Initiative,” Citigroup had “directed \$36.35 billion into such initiatives so far...” — of  
24 which they brag: “In the U.S., Citi has the largest market share (28 percent) of U.S. Department of  
25 energy section 1703/1705 Loan Guarantee program financings for alternative energy, and we are  
26 the leader in such bond transactions.”

27 Considering that in February 2013, I dedicated an entire post to Cit and their Massive  
28 ‘Green’ Money Machine,” which included a careful analysis of their “2012 alternative energy



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1 portfolio” that lists about 37 transactions (plus SolarReserve) — both foreign and here in the United  
2 States, here I’ll just give some highlights.

3 What I found is that 58 percent (22) of Citi’s clients had received government subsidies,  
4 totaling approximately \$16 billion from the taxpayer-funded Green Bank of Obama, the majority  
5 from stimulus package. Furthermore, my research not only “followed the green money,” but  
6 profiled the Citi executives that operate (d) inside the White House, some with key positions, which  
7 included President Obama’s 2013 choice to replace Timothy Geithner for Treasury Secretary with  
8 Jack Lew (former Chief of Staff), Michael Froman, Richard Parsons, Louis Susman, and Michael  
9 Eckhart — to name a few.

10 Many of the alternative energy projects that Citi was involved are mentioned in today’s  
11 study, starting with the Energy Department’s junk bond portfolio, which were doled out between  
12 2009 and 2011:

- 13 • BrightSource Energy was awarded \$1.6 billion GOVT loan for the Ivanpah solar  
14 facility in California
- 15 • Brookfield Renewable Power, whereas Granite Reliable received a \$168.9 million  
16 loan for a wind project in New Hampshire.
- 17 • Caithness/General Electric received a \$1.3 billion GOVT loan for the Shepherds Flat  
18 wind project in Oregon
- 19 • NextEra Energy /First Solar got a \$1.46 billion loan for the Desert Sunlight project in  
20 California;
- 21 • SolarReserve was awarded \$737 million GOVT stimulus loan for the Crescent Dunes  
22 project in Nevada.

23 According to their renewable energy portfolio, Citi, in February 2011, became a major  
24 investor in SolarCity. And, as I documented earlier, SolarCity, so far (and since 2009) has been  
25 subsidized with “green” through various stimulus funds, grants and federal tax breaks at the tune of  
26 \$514 million.

27 Citigroup, as of 2010 was listed as SunPower’s bookrunner. Then in August 2011 SunPower  
28 and Citi set up a \$105 million fund for residential solar leasing projects, which states, “SunPower

1 will use the fund to extend its SunPower Lease programme to customers in 8 US states, expanding  
2 the financing options available to homeowners interested in SunPower solar energy systems. The  
3 SunPower Lease is now available in Arizona, California, Colorado, Hawaii, Massachusetts, New  
4 Jersey, New York and Pennsylvania. Citi is contributing \$80m to the fund.” Again, I covered  
5 SunPower under Bank of America, showing that this solar firm was given plenty of green  
6 government subsidies:

7       In January 2010, SunPower Corp received four of the stimulus-enacted Section 48C Tax  
8 Credits totaling \$10.8 million.

9       In September 2011, SunPower is part of the \$1.2 billion stimulus loan to support the  
10 construction of the California Valley Solar Ranch (CVSR) in San Luis Obispo County.  
11 SunPower Residential, in 2013 and 2014, snagged 34 federal stimulus grants from the 1603  
12 Program for “solar electricity” that ranges across 12 states, totaling over \$86 million tax dollars.

13       #3) Goldman Sachs (possibly a donor since 2012):

14       Goldman Sachs was a top Obama donor in 2008, but we also know that two Goldman  
15 executives sat on Obama’s 2008 Finance Committee and a slew of partners, executives and board  
16 members bundled for, and donated to Obama’s 2008 campaign. Meanwhile, his administration has  
17 been infested with Goldmanites — even as early as 2008 when a Goldman board member, James A.  
18 Johnson (also an Obama bundler that I profiled many times due to his former firm Perseus), was  
19 chosen as head of Barack Obama’s vice presidential search team. Known as Jim Johnson and “a  
20 fixture of establishment Washington, with ties to Wall Street and “a major presence in Democratic  
21 politics for more than two decades,” Mr. Johnson resigned his VP vetting role amidst criticism over  
22 his part in the Countrywide Financial scandal as well as controversy surrounding his role as Fannie  
23 Mae’s chief executive from 1991 to 1999.

24       Even though in 2012, Goldman Sachs turned their back on Mr. Obama in 2012, there were  
25 many executives and board members that helped him get reelected.

26       Like Bank of America, I haven’t had the opportunity to examine Goldman Sachs’  
27 Alternative Energy Group and its Environmental Markets financing and advisory; however, we do  
28 know that Goldman has been investing in renewable energy since at least 2005.

1 By 2014, Goldman Sachs “declared that the renewable sector is one of the most compelling”  
2 — even as they backed “green” in 2012, having committed \$40 billion to renewable energy (made  
3 and planned investments). According to Renew Economy, “Stuart Bernstein, who heads the bank’s  
4 clean-technology and renewables investment banking group, told Recharge in a recent interview in  
5 a story titled Goldman goes Green, ”It is at a transformational moment in time.”

6 As Goldman promotes President Obama’s Climate Action Plan along with other winners of  
7 clean-energy funds, they also brag about their climate change roles: “In 2012, we financed nearly \$2  
8 billion and co-invested more than \$430 million in the sector. We also served as financial advisor on  
9 clean-energy transactions valued at more than \$1.1 billion.”

10 Needless to say, since 2010, I’ve been following Goldman and tracking how this Big Bank  
11 has been cashing in on the stimulus funds. As my research developed, I found their DNA all over  
12 this green energy scheme, of which to date we can confirm that Goldman Sachs has an invested  
13 interest — via various roles, and having entered the scene at different junctures (before, during and  
14 after taxpayer subsidies were awarded), in many projects and firms that received loans, grants and  
15 special tax breaks. So far I’ve tracked at least 14 firms connecting Goldman to over \$8.5 billion  
16 from the Green Bank of Obama, the majority from the 2009-Recovery Act.

17 Keep in mind too, that Goldman is associated (former executives and investments) with the  
18 Big VC firm Kleiner Perkins as well as Generation Investment Management (GIM) — mentioned a  
19 few times already. As a reminder, Kleiner Perkins is where we find the “climate duo,” whose  
20 combined carbon footprint is larger than my entire city: Billionaires John Doerr and Al Gore  
21 (partners at the firm), where Doerr, “a very big-ticket Obama donor,” in January 2009, persuasions  
22 were reflected in the 2009-Recovery Act via his “meetings with Obama’s transition team and  
23 leaders in Congress” as well as the fact that he made “five recommendations to Congress and  
24 President-elect Barack Obama to jumpstart a green-tech revolution and fight global warming.”

25 Shortly thereafter (around February 6, 2009) and just days prior to signing the stimulus bill  
26 (February 18, 2009), Obama appointed Doerr as a member of his Economic Recovery Advisory  
27 Board (PERAB), which later morphed into the president’s jobs council — only to close down in  
28 February 2013.

1 Meanwhile, back in 2004 Gore started GIM with former CEO of Goldman Sachs Asset  
2 Management David Blood, who is another Obama bundler. Apparently, Blood is the “wizard  
3 behind” GIM, and behind this “sustainable firm” are several former Goldman executives and  
4 partners — even as Doerr, in 2007, joined the GIM advisory board.

5 This and more insight were profiled in my January 8, 2013 file on Doerr and Gore, whose  
6 “Greentech Portfolio” (at least 50%) and GIM’s “Sustainable Investing” secured billions in loans,  
7 grants and special tax breaks — the two firms combined are tied to at least \$10 billion from the  
8 taxpayer-funded Green Bank of Obama, the majority coming from the 2009-Recovery Act, of  
9 which Doerr had helped author.

10 As far as Goldman: first off they made big money from the sale of Horizon Wind Energy to  
11 Portugal’s EDP for \$2.5 billion in 2007, of which ironically, starting in 2009 until the end of 2012,  
12 EDP Renewables North America LLC (formerly Horizon Wind Energy LLC), received over \$700  
13 million of free taxpayer money from the Obama stimulus bill (\$722,468,855 in Section 1603  
14 Grants) for eleven wind projects, placing them at the number two spot of foreign firms that were  
15 winners of US grants. This was a shocking report released in early 2013 by the Energy and  
16 Commerce Committee, exposing the extent to which foreign corporations are benefiting from green  
17 energy stimulus funding.

### 18 **Goldman’s Green Losers, Winners, Biofuels, & Smart Grids**

19 Nevertheless, Goldman is credited as the “exclusive financial adviser” for the now bankrupt  
20 Solyndra (\$570.4 million loss), and in 2010, handled the IPO of what most deem a government  
21 winner, Tesla Motors that was awarded \$465 million from the GOVT ATVM program. Also,  
22 according to Goldman, “In May 2013, [they] helped raise over \$1 billion in new financing for Tesla  
23 Motors.”

24 There are more bankrupt ones as well: SpectraWatt (\$20.5 million), Nordic WindPower  
25 (\$8.6 million), and Suntech Power Holdings Co. (\$2.1 million) — all taking millions of taxpayer  
26 money down with them, while Goldman remains unscathed.

27 Goldman is also active in advanced biofuels and feedstock companies, handling the IPOs of  
28 biofuel companies, of which at least two won money and contracts from the Obama administration:

1 Amyris (\$25 million stimulus grant), Kior (seeking \$1 billion GOVT loan) and Solazyme (\$21.7  
2 million GOVT stimulus grant; plus part of the \$12 million biofuel contract with the U.S. Navy) —  
3 the latter company has its very own direct connection to CAP: Jonathan Wolfson, Solazyme co-  
4 founder and Chief Executive Officer, “is an active participant in many advisory groups, including  
5 sitting on the board of the Center for American Progress (CAP) Clean Tech Council.

6 Meanwhile, Goldman hooked up with another huge winner of stimulus funds: “In March  
7 2013, [they] served as lead-left bookrunner on the \$93 million initial public offering for Silver  
8 Spring Networks” — a Foundation Capital, Kleiner Perkins, and Google (all with friends in the  
9 White House) green investment, which in 2009, cashed in big time when the GOVT starting  
10 handing the smart-grid grants as part of the 2009-Recovery Act. During the course of my January  
11 2013 analysis on Silver Spring, I found that 30 percent of the \$4.5 billion stimulus smart-grid grants  
12 went to their “customers” — that’s over \$1.3 billion. Then in my May 2013 report, “Smart Gird,  
13 Dirty Devices”, I documented additional ties and an interesting analysis of its IPO: “Silver Spring  
14 IPO has more red flags than a Communist Party military parade,” PrivCo CEO Sam Hamadeh.

#### 15 **Goldman’s Green GOVT Stimulus Loans**

16 Considering that First Solar is also a CAP Business Alliance Member (donor), we’ll expand  
17 on that solar firm later, but what is key here is that Goldman was an early investor in First Solar that  
18 snagged three large GOVT stimulus loans (over \$3 billion) — a story we’ve featured many times,  
19 starting with “The First Solar Three Billion Dollar Swindle.”

20 Still, Goldman was (is) also an investor in U.S. Geothermal that in February 2011, landed a  
21 \$97 million GOVT stimulus loan slated to build a 22-megawatt power plant in the eastern Oregon  
22 desert. This was — one of the first geothermal projects funded by the GOVT, despite the fact that in  
23 December 2010, S&P had rated this loan as non-investment grade. Yet, the “2012 Internal GOVT  
24 Email Dump” prove that this deal was rushed and approved in time for a POTUS photo op.  
25 Moreover, U.S. Geothermal had other projects that snagged millions in green energy subsidies.

26 Then in September 2011, Cogentrix of Alamosa, LLC (Cogentrix Energy a subsidiary of  
27 Goldman Sachs), was awarded a \$90.6 million GOVT stimulus loan for the Alamosa Solar  
28 Generating Project in Colorado. Cogentrix, on July 16, 2012 bagged a \$34.6 million stimulus grant

1 (free taxpayer money) from the 1603 Grant Program — I’m assuming this is for the same project.

2 But that’s not all....

3 **BrightSource Energy Just Got Darker**

4 According to Renew Economy (January 2014), “[Goldman] has also a substantial  
5 investment in BrightSource Energy,” which actually brought its Ivanpah solar power facility into  
6 full production last month — and if not for a federal loan guarantee, the \$2.2-billion project would  
7 have never seen the light of day. Now this massive solar power plant (struggling to produce power)  
8 has become the “\$2.2 Billion Bird-Scorching Solar Project” — with even the left-leaning Los  
9 Angeles Times, chronicling their grand opening like this:

10 After nearly four years of construction that killed desert tortoises, burned the feathers off  
11 passing birds and mowed down thousands of acres of native flora, Ivanpah officially opened last  
12 month with a gala that included a rock band and a horde of dignitaries — Energy Secretary Ernest  
13 Moniz among them.

14 We’ve been uncovering BrightSource Energy’s \$1.6 billion shady GOVT deal since July 6,  
15 2012, and as new information became available we’ve revisited this huge solar transaction several  
16 times. In short, the Ivanpah Solar Electric Generating System (SEGS) in California was subsidized  
17 with a  
18 \$1.6 billion GOVT stimulus loan, which was announced on February 22, 2010 and finalized April  
19 11, 2011 — a project that also received special treatment by the Department of Interior, which was  
20 documented in Plaintiffs “2012 Special Seven Series.”

21 Still, BrightSource investors not only include Goldman Sachs, but additional 2008 Obama  
22 donors such as Google, Morgan Stanley, and BP Alternative Energy. Meanwhile the Ivanpah  
23 project incorporates a slew of ties to President Obama as well as Vice President Joe Biden and  
24 Senator Harry Reid. This story comprises of big donors, political cronies and connections such as  
25 BrightSource, VantagePoint, Google, NRG Energy, PG&E, Goldman Sachs, Citigroup, George  
26 Soros, the former Commerce Secretary John Bryson, McBee Strategic Consulting, lobbyists Bernie  
27 Toon, and others — with GOVT officials, Obama’s Green Team, and several in Congress from the  
28 Democrat side involved.

1 While I briefly addressed Citigroup's part in this billion-dollar deal in February 23, 2013  
2 (Ongoing — \$250mm IPO / Joint Bookrunner), it should be noted that just days after the  
3 finalization of the \$1.6 billion government loan, BrightSource had filed for and IPO, of which  
4 Goldman Sachs Group Inc., Citigroup Inc. and Deutsche Bank AG were leading the proposed  
5 offering. However, a year later, they canceled their IPO, and BrightSource CEO John Woolard  
6 (now former) told Gigaom.com that it was “because of the weak public markets, particularly for  
7 solar and greentech companies...” — of which, to date the IPO is still pending. Yet, we do know  
8 that Goldman has made equity investments in the solar developer BrightSource.

9 We also can confirm that additional political heavyweights have been hovering over this  
10 deal, starting with Bechtel (another big corporation with their hand in the stimulus) that constructed  
11 BrightSource's Ivanpah project as well as the fact that sometime in October 2010, during the time  
12 of their GOVT loan review process, “NRG became the lead investor (\$300m) in Ivanpah solar  
13 project. In fact, as mentioned, this was one of the four (now three) large taxpayer-funded stimulus  
14 projects that NRG Energy is part of.

15 **Side Note:** My March 22, 2013 file covers The Soros connection, its CEO David Crane, and  
16 more. My September 2013 post on BrightSource's Top DC lobbyist (since 2009) gives more insight  
17 into other players inside this \$1.6 billion GOVT deal, such as VantagePoint, Google Inc, and  
18 PG&E, which included ongoing interaction and pressure from the heavyweight K Street firm  
19 McBee Strategic Consulting — another huge player inside this green energy scam. What's key is  
20 that Steve McBee “reportedly wrote key provisions in the stimulus bill to open the spigot of green  
21 corporate welfare” — thus over 60 percent of his energy client list cashed in under the Obama  
22 administration.

23 Lastly, in November 2013, we unleashed BrightSource's connection to Senator Harry Reid  
24 as well as the incriminating “2012 Internal GOVT Email Dump” relevant to this particular GOVT  
25 transaction.

26 What's key here is that BrightSource Energy has never been solid. In fact, the “Oakland-  
27 based BrightSource Energy Inc. had emerged from the bankruptcy of its parent company.” Now I'm  
28 assuming this was out of the ashes of BrightSource Industries (Israel) Ltd. that was formerly known



1 as LUZ II Ltd., and changed its name in December 2008.

2           Nevertheless, according to Schweizer in Throw Them All Out, as he described the financial  
3 issues they were having, “BrightSource badly needed this infusion of taxpayer cash.” So in essence  
4 this \$1.6 billion stimulus GOVT deal was a bailout, which is a clear violation of the American  
5 Recovery and Reinvestment Act of 2009 — a fact that we elaborated on many times.

6           **Goldman: SolarCity, SunEdison & SunRun**

7           According to Renew Economy (January 2014), “Goldman Sachs also provided \$500 million  
8 of finance to SolarCity, to allow the biggest solar installer in the US to expand its solar leasing  
9 business. Goldman is one of a number of banks to do that — the latest was Bank of America/Merrill  
10 Lynch.”

11           Goldman, in 2012, also handled the IPO for SolarCity — the solar firm I first highlighted  
12 under the Podesta Group (became a 2012 client) and expanded upon under Bank of America, noting  
13 that SolarCity was not only in line to receive a loan from the Energy Department, but as  
14 documented earlier, SolarCity, so far (and since 2009) has been subsidized with “green” through  
15 various stimulus funds, grants and federal tax breaks at the tune of \$514 million. We’ll keep  
16 watching...

17           There is also SunEdison LLC — a global provider of solar-energy services — which was  
18 also an early Goldman Sachs investment. Due to the fact that this solar firm also became a client the  
19 Podesta Group in 2012, I covered the fact that in 2013, SunEdison won 5 federal stimulus grants  
20 from the 1603 Program for “solar electricity” that ranges across 5 states, totaling over \$1.8 million  
21 tax dollars.

22           Furthermore, SunEdison is in cahoots with JPMorgan, GE Capital as well as Southern  
23 Company and a few other familiar green energy players and CAP donors such as Bank of America,  
24 Duke Energy, and First Solar.

25           Just last month, the Wall Street Journal reported, “Sunrun Inc., a company that finances and  
26 installs home solar projects, has retained Goldman Sachs to raise a growth equity round of more  
27 than \$100 million, according to a person familiar with the situation.”

28           SunRun can be found in my May 2012 research on Foundation Capital — another friend of



1 the Obama White House and big VC winner of taxpayer money from the Green Bank of Obama,  
2 adding to my long list of Big VC's that have had made out like bandits. As of October 2013 , I  
3 found that SunRun, between 2011 and 2013, snagged 23 federal stimulus grants from the 1603  
4 Program for "solar electricity" that ranges across 10 states, totaling over \$141 million tax dollars,  
5 thus far.

6 Plus in 2010, SunRun announced a \$100 million joint program with major utility Pacific Gas  
7 & Electric, which according to Venture Beat, "PG&E will be funding the rooftop systems in  
8 question via its subsidiary, Pacific Energy Capital II, a tax equity fund," of which "In lieu of  
9 traditional returns, the investor — PG&E in this case — gets tax benefits in addition to some cash  
10 returns."

11 **#4) Covanta Energy (confirmed donor since 2012):**

12 This was one of those Soros timely investments (twelve alternative energy and utility  
13 companies) that I had alluded to in the beginning of this post and exposed in my March 2013 Green  
14 Corruption File. I found that Covanta, a clean-energy company and the recipient of federal stimulus  
15 grants, also received millions in 2010 through Congressional earmarks, yet it is unclear as to how  
16 many green government subsidies or the exact stimulus dollar amount that Covanta Energy  
17 snagged. Also, Covanta Energy stands to benefit from the NAT GAS Act if it comes to light again.

18 **#5) General Electric (confirmed donor since 2011):**

19 General Electric (GE) is a heavy donor to both Republicans and Democrats, and its CEO  
20 Jeffrey Immelt "plays the role of typical corporate donor who hedges his bets on both sides of the  
21 fence." However in 2008, GE gave the Obama campaign \$529,855, marking them as a top Obama  
22 donor.

23 Meanwhile, in early 2009, Immelt was first appointed as a member of Obama's Economic  
24 Recovery Advisory Board (PERAB), which later morphed into the president's jobs council, where  
25 Immelt served as the Jobs Czar, until it closed down in February 2013.

26 Nevertheless, GE is a major player on the clean-energy scene as well as in this green energy  
27 scheme, starting with the fact that they were also part of the GOVT's Electricity Advisory  
28 Committee that had influence into the 2009-Recovery Act. In 2009, the New York Times

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1 recognized GE's green power, noting, "GE lobbied Congress to help expand the clean-energy  
2 subsidy programs, and it now profits from every aspect of the boom in renewable-power plant  
3 construction, including hundreds of millions in contracts to sell its turbines to wind plants built with  
4 public subsidies."

5 I've been keeping track of GE's "green tab" since 2012, which at that time exceeded \$3  
6 billion in direct (some indirect) taxpayer cash. This tally includes three large stimulus loans from  
7 Energy Department's junk bond portfolio that were doled out between late 2010 until September  
8 2011.

9 Considering the treasure trove of Intel found in the "2012 Internal GOVT Email Dump," I  
10 revisited GE in my December 2012 post. Long story short, in October 2010, the Caithness  
11 Shepherds Flat wind project located in eastern Oregon was awarded a \$1.3 billion GOVT stimulus  
12 loan — a \$2 billion project sponsored by GE, who also supplied the project with 338 wind-turbines.  
13 These internal emails show that this transaction was approved with White House pressure. For  
14 example:

15 September 9, 2010 EMAIL: James McCrea (subject line: Shepherds Flat — Draft Responses  
16 to OMB Questions), "As you all know, the pressure to make decisions on this transaction are high  
17 so speed of the essence." Then later that day, McCrea writes (Email #4 from Appendix I) he says,  
18 "Pressure is on real heavy on SF [Shepherds Flat] due to interest from VP."

19 Shepherds Flat's developers also received "a \$500 million federal grant, state tax credits  
20 totaling \$18 million, accelerated depreciation on federal and state taxes worth \$200 million, and a  
21 premium for its power from the state worth \$220 million." At some point, the Shepherds Flat wind  
22 farm received three separate tax credits totaling \$30 million from the state of Oregon.

23 But there's more...

24 In September 2011, the poorly rated 1366 Technologies, sponsored in part by GE, received a  
25 direct \$150 million stimulus loan from the GOVT for its solar manufacturing plant.

26 GE is also part of the \$1.2 billion GOVT stimulus loan for the Desert Sunlight project,  
27 which was finalized in September 2011. This is part of the First Solar Swindle that has been  
28 mentioned a few times in this post, and will be detailed later.

1 Federal Railroad Administration (FRA) loaned \$54.6 million to Kansas City Southern  
2 Railway Company (KCSR) “to purchase thirty new General Electric ES44AC diesel-electric  
3 locomotives” — a loan that raised red flags in the March 2012 House Oversight investigation.

4 Also, you’ll be “blown away” by the billions of “wind energy grants” that flew out of the  
5 stimulus package back in February 2010, of which at that time, GE was contracted to at least 26%  
6 of them as the “Turbine Manufacturer.”

7 In late 2009, it was reported by Gigaaom, “GE is one of the newer smart meter players, but  
8 the conglomerate has been working with utility Oklahoma Gas & Electric on a 6,600 smart meter  
9 trial, and has a contract with PHI, which received \$104.80 million for a smart meter deployment in  
10 Washington, DC. GE also has a big contract with Florida Power and Light” that also the recipient of  
11 a \$200 million stimulus grant.

12 Other than bagging direct green energy stimulus money, GE has also joined forces with  
13 others that have benefited from Obama’s alternative-energy taxpayer funds. Two in particular —  
14 the Advanced Metering Partners, another John Doerr “venture” via Silver Spring Networks, as well  
15 as Energy Technology Ventures formed in 2011 with NRG Energy and ConocoPhillips. And, I’m  
16 sure if were to visit GE again, we’d find much more than \$3 billion in green energy funds.

17 **#6) Google (confirmed donor since 2012):**

18 Google, like Wall Street and Big Energy, plays the political game well: it’s all about access  
19 and influence, starting with campaign contributions. Google’s \$814,540 contribution to then-  
20 Senator Obama’s campaign made it the fifth largest donor in 2008, and in 2012 moved up to the  
21 number three spot with a whopping \$805,119. Furthermore, Google’s CEO at the time, Eric  
22 Schmidt, served as an informal advisor to President Obama. Schmidt, Google Executive Chairman,  
23 was also an Obama donor in 2008, and since April 2009, is (was) a member of the president’s  
24 Science and Technology Advisory Council (PCAST).

25 Another Google political connection is Dan Reicher, director of climate and energy  
26 initiatives at Google, who was one of the founders of Cleantech and Green Business Leaders for  
27 Obama. There are other interesting folks behind the Google scenes such as John Doerr and Al Gore  
28 — the dynamic climate duo mentioned periodically in this post — who has served as a member of

1 Google's board of directors since May 1999, with Gore as a (past) senior advisor.

2 And according to Michelle Malkin, "Google cofounder Sergey Brin, Chief Legal Officer  
3 and Senior Vice President David Drummond, and Google Vice President and Chief Internet  
4 Evangelist Vint Cerf are all vocal Obama supporters and top donors." Meanwhile, Google co-  
5 founders Sergey Brin & Larry Page, invested in Tesla Motors, while Google, in 2011, partnered  
6 with SolarCity (mentioned a few times now) to create a \$280 million fund for residential solar  
7 projects — both BIG winners of "green" taxpayer money.

8 Like many of these Big VC's that won a significant amount of green money from the  
9 Obama administration — Kleiner Perkins, Khosla Ventures, The Westly Group, VantagePoint  
10 Capital Partners, Google Ventures, Foundation Capital, and others — their "cleantech investments"  
11 overlap, and I briefly touched on Google in my January 2012 post about Doerr and Gore.

12 Later, I documented Google as energy client of McBee Strategic Consulting (in my  
13 September 2013 Green Corruption File), discovering and exposing the fact that Google Ventures —  
14 via their "Energy Investments" and other "green deals" that I tracked down at that time — has ten  
15 verified stimulus and other green energy money winners, which places their investment score at  
16 close to \$5 billion of taxpayer cash, which includes three GOVT loans: BrightSource Energy (\$1.6  
17 billion); GE's Caithness Shepherds Flat wind project (presented under GE for \$1.3 billion); and  
18 Tesla Motors that won \$465 million ATVM loan. If you add in Silver Spring Networks' customers  
19 that won \$1.3 billion in smart-grid stimulus grants, which I divulged here a few times, that figure  
20 rises to \$6.3 billion and counting.

21 **#7. PG&E (confirmed donor since 2011):**

22 This utility giant is a strong Obama and Democrat donor that happens to be all over this  
23 "green" scam. Not only did they have direct influence over the GOVT loans, they are jam-packed  
24 with Washington "green cronies," including Cathy Zoi, who is the "most controversial former  
25 PG&E employee to hold an influential government." Zoi, an Al Gore acolyte was a GOVT Insider  
26 from 2009 until 2011, and she is not only tied to PG&E but other stimulus winners.

27 Still, PG&E was another client of the top DC lobbyist, McBee Strategic Consulting, of  
28 which I divulged in my September 2013 Green Corruption File. As reported by the Washington

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Free Beacon in 2012, “PG&E has become an aggressive buyer of power supplied by solar, wind, and other renewable sources, in large part due to statutory requirements under California’s Renewable Portfolio Standard, which mandated that 20 percent of the utility’s electricity come from renewable sources by 2010 — and 33 percent by 2020.”

The big win for this huge energy corporation is that they have an invested interest in seven Energy Department stimulus loans worth \$7.6 billion. Moreover, with the exception of BrightSource Energy’s \$1.6 project, of which we now know from an email Dated January 4, 2010, that Peter Darbee, then CEO of PG&E, had himself spoken to President Obama about this deal, the rest of the loans were finalized between June and September 2011. While the details into these taxpayer-funded projects can be found in my April 2013 post, here’s an overview.

Agua Caliente Solar Power Project located in Yuma, Arizona, of which “PG&E will purchase the project’s power and deliver it to customers in California.” Project by NRG Solar: \$967 million loan guarantee

BrightSource Energy development located in Baker, CA, of which “electricity from the project will be sold under long-term power purchase agreements with Pacific Gas & Electric and Southern California Edison Company (SCE).” Project by NRG Energy, Inc. (BrightSource): \$1.6 billion loan guarantee

California Valley Solar Ranch of which the 250-megawatt is under construction in eastern San Luis Obispo County, and “is generating clean, reliable solar power for transmission over PG&E’s utility grid.” Project by NRG Solar and SunPower is still involved: \$1.237 billion loan guarantee

Desert Sunlight Project located in Riverside, CA, with the PPA (purchase power agreement) listed as Southern California Edison and PG&E. This is a First Solar Project that is co-owned by NextEra Energy Resources, GE Energy Financial Services, and Sumitomo Corporation of America: partial guarantee of \$1.46 billion

Genesis Solar Energy Project located in Riverside County, CA of which “power from the project will be sold to Pacific Gas and Electric Company.” Project by NextEra Energy Resources, LLC: partial guarantee of \$852 million loan

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1 Mesquite Solar 1, LLC located in Maricopa County, AZ, of which Bloomberg News had  
2 reported at the time the GOVT loan was approved, “Sempra will sell electricity from the Mesquite  
3 Solar 1 plant to California’s largest utility, PG&E Corp., under a 20- year contract.” Project by  
4 Sempra Mesquite: \$337 million loan guarantee

5 Mojave Solar located in San Bernardino County, CA, of which at the time of the GOVT  
6 loan approval (September 2011), “Abengoa signed a power-purchase agreement with PG&E to buy  
7 the energy produced by the project for a period of 25 years.” Project by the Spanish firm Abengoa  
8 Solar, Inc.: \$1.2 billion loan guarantee

9 Meanwhile, my May 2013 “Smart Grid, Dirty Devices” divulges PG&E’s partnership with  
10 Silver Spring Networks on many fronts (PG&E is their top customer). Silver Springs is the the  
11 lucky smart-grid technology company that I mentioned earlier, who has an array of White House  
12 connections — Foundation Capital, Kleiner Perkins and Google — and as of January 2013 is linked  
13 to at least \$1.3 billion in smart-grid stimulus grants.

14 But there’s more...

15 PG&E won a significant amount of stimulus money for various projects, of which last year I  
16 found at least seventeen that added up to over \$55 million of tax dollars.

17 PG&E also bagged at least four stimulus 1603 grants in 2012 and 2013 (for fuel cell,  
18 hydropower and solar) totaling \$127.2 million.

19 SolarCity and SunRun, who both won large sums of stimulus money (duly noted in this  
20 post), are in cahoots with P.G.&E. Corporation, the California utility holding company’s tax-equity  
21 fund to finance residential solar installations.

22 CAP’S 2011 & 2012 DONORS: Clean-Energy Money Winners (referred to as “American  
23 Progress Business Alliance Members”)

24 **Energy/Utilities**

25 **#8) American Electric Power (AEP):**

26 While I found that AEP (between 2009 and 2010) was awarded at least four stimulus grants  
27 totaling \$740 million, which was detailed in my March 2013 Green Corruption File, there is more to  
28 share. According to Schweizer’s bombshell book, “in the first quarter of 2009, Soros made an initial

1 purchase of more than 1.5 million shares in American Electric Power (AEP), a utility company that  
2 invested heavily in an energy project called FutureGen.”

3 This was a project that had been abandoned by the Bush administration; however, on June  
4 12, 2009, the Obama administration revived FutureGen: “a federal-industry partnership that would  
5 build an advanced coal-burning power plant in Illinois to trap and store carbon dioxide emissions.”  
6 After Obama took office, he not only restarted FutureGen with \$1 billion from the stimulus  
7 package, but he moved the project to Meredosia.

8 The FutureGen Industrial Alliance “was formed to partner with the U.S. Department of  
9 Energy on the FutureGen project.” At that time it was a consortium of major coal and utility  
10 companies such as American Electric Power Co. Inc. and Peabody Energy Corp. Just thirteen days  
11 later, both AEP and Southern Co withdrew from the U.S.-government backed FuturGen project.

12 Despite ongoing drama, cost overruns and delays, as well as potential air pollution and other  
13 matters; back in February 2013, the FutureGen project was moving forward. While AEP was gone,  
14 we did find Ameren Corp (another Soros timely investment) along the way. Currently the  
15 FutureGen Industrial Alliance includes Alpha Natural Resources, Joy Global Inc, Peabody Energy,  
16 Xstrata Coal Pty Limited, and another CAP corporate donor, Anglo American (up next).

17 **#9) Anglo American (confirmed donor since 2012, listed under energy/utility):**

18 As detailed above, Anglo American, “one of the world’s largest mining companies, is  
19 headquartered in the UK and listed on the London and Johannesburg stock exchanges,” is now part  
20 of the FutureGen project funded with green energy funds. This past January, the Energy Department  
21 “gave the long-planned FutureGen clean-coal project one of the final OKs [and \$1 billion] it needs  
22 to start building,” announced the Daily Journal.

23 According to most reports, “If all goes according to plan, the FutureGen project should be  
24 fully operational by 2017 and continue commercial operations for at least 20 years.”

25 **#10) Constellation Energy:**

26 Again, this is one of those twelve alternative energy and utility companies that another Soros  
27 had invested in shortly having helped craft the 2009 stimulus package that I had alluded to in the  
28 beginning of this post (exposed in my March 2013 Green Corruption File). I found that



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1 Constellation, an Exelon Company, which is labeled as “the president’s utility,” was another top  
2 2008 Obama donor and big winner of “green” funds. Constellation received a \$200 million stimulus  
3 grant, of which since they are (were) the parent of Baltimore Gas and Electric Co, I’m assuming the  
4 \$200 million smart-grid grant (awarded in October 2009) that went to BGE is the one Schweizer  
5 had mentioned in his book (unless they got another \$200 million for something else).

6 Moreover, according to the Washington Free Beacon, “Constellation is one of the most  
7 prolific providers of green energy to federally owned facilities, sporting contracts with the General  
8 Services Administration (GSA) for the U.S. Capitol building, the Federal Reserve, the Smithsonian  
9 Institution, the United Nations building in New York, and a host of federal buildings in several  
10 states.”

11 **#11) Dow Corning (Silicone Manufacturing/Solar):**

12 In January 2010, two manufacturing tax credits were awarded from the 48C stimulus-created  
13 program for solar projects in Michigan. The tax credits included “\$141.9 million for Hemlock  
14 Semiconductor’s (a joint venture of Dow Corning Corporation and others) expansion of its  
15 Michigan polycrystalline silicon operations, and \$27.3 million for a monosilane plant Dow Corning  
16 is building.”

17 By 2012, Hemlock Semiconductor announced that they “were postponing three of the four  
18 phases of their \$1.2 billion plant in Tennessee,” of which the state of Tennessee had committed  
19 \$245 million to Hemlock — some of which was stimulus funds. In 2013, the company began laying  
20 off hundreds of workers at their Clarksville plant — even 100 were from their facility in Michigan  
21 (March 2013), and 50 more in May 2013. With the future of their plants unknown, “Dow Corning  
22 Corp. announced [November 2013] that it is acquiring a bigger stake in Hemlock Semiconductor.”  
23 So, here we have two more failing stimulus-funded projects that we need to watch — and a CAP  
24 donor ta boot.

25 **#12) Duke Energy:**

26 As duly noted, Duke Energy — the nation’s largest electric power company — has been a  
27 client of the Podesta Group since 2009. Jim Rogers, the chairman of Duke Energy, is another  
28 Obama donor, who was a major player at the 2012 Democratic convention, as a contributor,



1 creditor, host, and even a speaker.

2 While Duke Energy is worthy of additional scrutiny, my January 2013, Big Wind Story  
3 documented that in 2011, Duke Energy was the recipient of a \$22 million grant from the GOVT's  
4 ARPA-E advanced energy research program that was funded by the 2009 stimulus package. This  
5 was "to design, build and install large-scale batteries to store wind energy at one of its wind farms  
6 in Texas."

7 Then in May 2013 (previously dated June 2010), Notrees Windpower — a project of Duke  
8 Energy located in Texas — was handed a stimulus grant from the 1603 Program for \$103.6 million.  
9 And after a quick glance, I found three 1603 stimulus grants for Duke Energy Carolinas, LLC that  
10 were dished out in 2012 and 2013, totaling over \$62 million for "hydropower" and "solar  
11 electricity." Duke Energy was also privy to the "smart" money as well — in 2009, the GOVT  
12 awarded Duke Energy a \$200 million stimulus smart-grid grant to support projects in the Midwest.

13 **#13) Enel Green Power North America:**

14 In July 2012, Enel Green Power, through its US subsidiary Enel Green Power North  
15 America Inc., was awarded a grant for approximately \$99 million from the 2009-Recovery Act  
16 1603 grant program for the construction of the Caney River wind farm in Kansas. The Caney River  
17 and the Rocky Ridge wind farm project includes J. P. Morgan as well as Wells Fargo Wind  
18 Holdings LLC and Metropolitan Life Insurance Company.

19 **#14) First Solar (Solar Manufacturing and possibly a 2011 donor):**

20 As I've alluded to many times in this post and others, First Solar has considerable ties to the  
21 Obama administration, starting with the fact that this solar firm was an early investment of  
22 Goldman Sachs, the Wall Street giant mentioned above as a CAP corporate donor since 2012  
23 (maybe sooner).

24 In the mix we find another First Solar investor — Generation Investment Management  
25 (GIM), which as you know, is Al Gore's sustainability firm tied to many green energy deals. Along  
26 the way we find a myriad of Obama billionaire cronies (donors and bundlers) that were also  
27 investors in First Solar: Ted Turner, Paul Tudor Jones, Whitney Tilson, David Shaw, as well as the  
28 fact George Soros bought First Solar stock sometime in late 2007, until about May 2011, as

1 recorded at GuruFocus.com.

2 Prior to the \$3 billion in GOVT stimulus loans, in 2010, First Solar snagged \$16.3 million  
3 “to expand its manufacturing facility to produce fully completed thin-film solar modules,” in Ohio,  
4 which was part of the 2009-Recovery Act via the GOVT / Treasury, Clean Energy Manufacturing  
5 Tax Credits (48C). According to reports, “The Ohio Department of Development also lent First  
6 Solar \$5 million, and the state’s Air Quality Development Authority gave the company an  
7 additional \$10 million loan” — marking First Solar’s Ohio facility as taxpayer-funded with over  
8 \$30 million.

9 But it gets better: First Solar, in 2011, “also scored \$547.7 million in loan guarantees [by the  
10 controversial taxpayer funded export-Import Bank (Ex-Im)] to subsidize the sale of solar panels to  
11 solar farms abroad,” as documented by Veronique de Rugy (senior research fellow at the Mercatus  
12 Center) in her stunning assessment of GOVT’s Loan Program. Ms. de Rugy goes on, “More  
13 troubling is the fact that some of the Ex-Im money [\$192.9 million] went to a Canadian company  
14 named St. Clair Solar, which is a wholly owned subsidiary of First Solar, meaning that the company  
15 received a loan to buy solar panels from itself.”

16 This Ex-Im transaction even hits closer to CAP, starting with Carol Browner — CAP fellow,  
17 former GOVT insider, and Al Gore’s pal — who is sits on (and has for a while) the Advisory  
18 Committee of the export-Import Bank.

19 Still, the Daily Caller last month, unearthed another alarming connection: “[First Solar] is  
20 not only listed as a CAP donor, but has also been listed as a client of the Albright Stonebridge  
21 Group (ASG) in 2011 — a lobbying firm founded by former Clinton Secretary of State Madeleine  
22 Albright. ASG is also listed as a CAP donor.”

23 And, it gets better, as reported in The DC...

24  
25 Coincidentally, export-Import Bank President Fred Hochberg has spoken annually at CAP since  
26 2011 — the same year First Solar got its loan. It is unknown whether the solar company was also a  
27 CAP donor at the time.

28 When Hochberg spoke at the progressive think tank in 2012, he mentioned that Alice

1 Albright was in attendance — Madeleine Albright’s daughter and the Ex-Im’s chief operating  
2 officer from 2009 to 2013. Hochberg spoke on June 25 and First Solar was awarded \$57.3 million  
3 in financing on July 18.

4 In 2011, Hochberg spoke on June 15 and, just over a week later on June 23, Ex-Im awarded First  
5 Solar millions more in financing. That year the taxpayer-backed export bank awarded First Solar  
6 nearly \$573 million to make their products more competitive abroad and boost their sales — most  
7 of that financing came after Hochberg gave his speech. First Solar Vice President Frank de Rosa  
8 was likely bundling donations for Obama’s reelection campaign around this time.

9 Nevertheless, the big money came from the Energy Department: First Solar, an Arizona-  
10 based manufacturer of solar panels, in August and September 2011, won three 1705 GOVT “junk  
11 rated” stimulus loans totaling over \$3 billion. Marita Noon and I first covered the “First Solar  
12 Swindler” in the summer of 2012, which began by documenting how seven solar companies  
13 received fast-tracked approval by the Department of the Interior (DOI) to lease federal lands in a  
14 no-bid process:

15 Abengoa Solar, BrightSource Energy, First Solar, Nevada Geothermal Power, NextEra  
16 Energy Resources, Ormat Nevada, and SolarReserve.

17 Since then, we’ve tracked First Solar’s woes, which began since the finalization of these  
18 three large GOVT loan guarantees — projects, by the way, that were sold to more Obama “energy”  
19 cronies just after the taxpayer funds were approved. However, First Solar remained involved in all  
20 of them.

### 21 **The Projects**

22 Exelon (Antelope Valley Solar Ranch): \$646 million stimulus loan

23 In September 2011, the same day that the Antelope Valley Solar Ranch, located in  
24 California, received a GOVT loan guarantee for \$646 million, Exelon Corp. purchased it. First  
25 Solar, which developed the project, is still actively involved. The AVSR1 project, by the way, is  
26 expected to create 350 constructions jobs and 20 permanent jobs.

27 The Chicago-based Exelon Corp, a big Obama donor and labeled as “The President’s  
28 Utility,” by itself is a huge piece of the Green Corruption scandal, which I have alluded to in the

1 past and a another piece of the scandal in the works.

2 **NextEra Energy Resources, LLC (Desert Sunlight): \$1.46 billion stimulus loan**

3 The California Desert Sunlight, in September 2011 — again the same day that this project  
4 received \$1.46 billion offer for a partial loan guarantee from the GOVT — was sold to NextEra  
5 Energy Resources, LLC, the competitive energy subsidiary of NextEra Energy, Inc. and GE Energy  
6 Financial Services. Yet, the September announcement also stated, “First Solar will continue to build  
7 and subsequently operate and maintain the project under separate agreements.” Both CEO’s Jeffrey  
8 Immlet and Lewis Hay were featured in my “Green Five: Spreading the Wealth to Obama’s Ultra-  
9 Rich Jobs Council Members” series.

10 According to the GOVT, Desert Sunlight, which is expected to create 550 construction jobs  
11 and 15 permanent jobs for the plant’s operation, “will deploy commercially available First Solar  
12 Series 3 modules and is projected to achieve commercial operation by February 28, 2015.”

13 **NRG Solar, LLC (Agua Caliente): \$967 million stimulus loan**

14 In August 2011, as the \$967 million GOVT loan guarantee for the Agua Caliente, located in  
15 Arizona, was announced, it was purchased from First Solar by NRG Solar, LLC, a subsidiary of  
16 NRG Energy. At that time it was noted that the First Solar will be providing the solar panels for this  
17 project, and that the plant, when completed, would supply power to PG&E.

18 According to the GOVT, the Agua Caliente project — considered another jobs creator with  
19 an expected 400 construction jobs and 10 permanent jobs — “currently generates enough energy to  
20 power 49,600 households annually.”

21 Keep in mind that documented much earlier was Steve Spinner — the two-time Obama  
22 bundler GOVT advisor ( April 2009 to September 2010) turned CAP fellow (September 2010 to  
23 October 2011) — and his part in the First Solar deal making, which included advocacy for the at  
24 least the Antelope Valley project. Nevertheless, there are additional CAP players here, starting with  
25 what The Nation revealed in May 2013:

26 José Villarreal — a consultant at the power-house law and lobbying firm Akin Gump, who  
27 ‘provides strategic counseling on a range of legal and policy issues’ for corporations — was on First  
28 Solar’s board until April 2012 while also sitting on the board of CAP, where he remains a member,

1 according to the group's latest tax filing.

2 **#15) First Wind**

3 In my January 2013 Big Wind Story — also a client of the top DC lobbyists McBee  
4 Strategic Consulting — I exposed a “twister of sweetheart deals” found in the Department of  
5 Energy's junk bond portfolio, which included four risky wind projects. One of those was Kahuku  
6 Wind Power, LLC, a project of First Wind in Kahuku Oahu, HI, which in July 2010, was granted a  
7 \$117 million GOVT stimulus loan, estimated to create a whopping 200 jobs. And then on February  
8 3, 2012 this same project received a 1603 grant for over \$35 million [docket #2594 to \$35,148,839].

9 Sadly, in August 2012 a fire that destroyed First Wind's battery storage facility (built by  
10 Xtreme Power) and sent toxic fumes into the air, which left ratepayers in the dark over costs and  
11 safety. And, it was reported on January 23, 2014 that “Xtreme Power ran out of cash and filed for  
12 bankruptcy,” — NOTE: Xtreme Power built the energy storage system for Duke Energy's Notrees  
13 wind energy farm in Texas, another winner of stimulus funds, listed above.

14 The First Wind plan was to secure taxpayer money and then go public. Now they achieved  
15 their first objective with the help of U.S. taxpayers, because and as of July 2012, First Wind's  
16 projects have also received over \$452 million in grants through the stimulus' 1603 Program.

- 17 • First Wind's Stetson Wind Farm in Maine — \$40,441,471
- 18 • Cohocton Wind Farm in New York, \$52,352,334
- 19 • Dutch Hill Wind Farm In New York, \$22,296,494
- 20 • Milford Wind Corridor Phase I In Utah; \$120,147,809
- 21 • Milford Wind Corridor Phase II In Utah, \$80,436,803
- 22 • Rollins Wind Farm In Maine; \$53,246,347
- 23 • Sheffield Wind Farm In Vermont, \$35,914,864
- 24 • Kahuku Wind Farm In Hawaii, \$35,148,839
- 25 • Steel Winds II Wind Farm In New York, \$12,778,75

26 However, in November 2010, Bloomberg announced, “First Wind Holdings Inc., the  
27 operator of wind-energy projects backed by D.E. Shaw & Co. and Madison Dearborn Partners LLC,  
28 said it withdrew its initial public offering because of unfavorable market conditions” that's code for

1 “weak demand.”

2 Speaking of IPO’s...

3 Within the House Oversight leaked emails that were unleashed late October 2012, more  
4 specifically the 350+ page Appendix II (“2012 Internal GOVT Email Dump”), we find that just  
5 months prior to the final approval of the Kahuka loan there was intense interaction within the  
6 GOVT regarding this transaction...

7 “Someone is pressing Jonathan [Jonathan Silver is the former Executive Director of the  
8 Loan Program Office] who is now pressing hard on the everyone as the sponsor has an IPO in the  
9 works.”

10 This and more can be found in my Big Wind Story, including a the fact the first-rate, high-powered  
11 political ties to First Wind are vast, starting with D.E. Shaw & Co, a New York-based investment  
12 firm that is a backer of First Wind Holdings Inc. (also an investor in First Solar). This was noted  
13 when I profiled Larry Summers from CAP — adding that, according to Peter Schweizer, “Larry  
14 Summers was part owner of First Wind.”

15 The founder of the hedge fund DE Shaw & Co., David Shaw, is a two-time Obama bundler,  
16 who employed Larry Summers before heading to the Obama White House, as the top economic  
17 advisor. It turns out that in 2011, according to BusinessInsider.com, Shaw, a computer scientist and  
18 computational biochemist, was “appointed by Obama to serve on the President’s Council of  
19 Advisors on Science and Technology.”

20 As revealed by Peter Schweizer, “another 42 percent of First Wind is owned by Madison  
21 Dearborn Partners, an investment firm with close ties [and friend of] to then-White House Chief of  
22 Staff Rahm Emanuel. The founder of the firm, David Canning, had been a bundler for George W.  
23 Bush. But he switched sides in 2008 and gave heavily to Obama. Madison Dearborn gave more to  
24 Emanuel’s congressional campaigns than did any other business.”

25 While the GOP found that “Julia Bovey, First Wind’s Director of External Affairs, was  
26 formerly Director of External Affairs for Obama’s Federal Energy Regulatory Commission (June  
27 2009 to June 2010),” there is much bigger fish here. All government backed green comes with a  
28 slew of lobbyists, and First Wind is no different — enter in Larry Rasky’s Lobbying Firm with ties

1 to the top.

2 Larry Rasky, “a longtime confidant and campaign strategist” of Vice President Joe Biden,  
3 was also a 2012 Obama bundler, and since Obama took office, “Rasky has visited the White House  
4 at least 21 Times,” half of which were during the course of the GOVT loan review process  
5 (Data.gov, Accessed 7/18/12). Moreover, we know that in 2009, about the time the 2009-Recovery  
6 Act passed, First Wind retained lobbyists Rasky Baerlein Strategic Communications as well as  
7 Brownstein, Hyatt et al, who is primarily a Democrat donor, with some Republicans in the mix —  
8 and as of 2012, maintains the work of Rasky. .

9 **#16) General Motors (donor in 2011)**

10 As I divulged at the beginning of this post, General Motors (GM) — a CAP donor in 2011  
11 — was a client of the Podesta Group from 2010 until 2012. Even after the taxpayers bailed out  
12 General Motors in 2009 (over \$80 billion — \$17.5 billion under Bush and \$63.4 billion from  
13 Obama), of which we lost at least \$14 billion, green energy taxpayer money continues to subsidize  
14 the failed auto maker. This time, though, was for GM’s hybrid electric vehicle the Chevy Volt — a  
15 car that’s not doing very well.

16 What I’ve tracked so far is that starting in 2009 until recently, GM has bagged hundreds of  
17 millions of stimulus dollars ( \$471.6 million to be exact) to support the Chevy Volt as well as green  
18 car components, of which I’ll share the details when I dissect the CAP corporate donors.

19 According to the January 25, 2012 House Oversight Report...

20 The American Recovery and Reinvestment Act of 2009 (ARRA) appropriated \$2.4 billion  
21 for domestic production of batteries and components for electric cars. Of this, \$1.5 billion in grants  
22 were directed toward manufacturing the batteries, while the remaining \$900 million went to  
23 building new facilities or improving existing facilities to produce electric drive components. This  
24 included \$151.4 million to Michigan-based Compact Power, Inc., for production of lithium-ion  
25 polymer battery cells for the GM Volt; \$105.9 million directly to GM for production of high-  
26 volume battery packs for the Volt; \$105 million to GM to construct facilities for electric drive  
27 systems; and \$89.3 million to Delphi Automotive Systems, a former division of GM, to expand  
28 manufacturing facilities for electric drive power components.

Also, “buyers of the Volt will receive a federal tax credit of up to \$7,500 of per vehicle” as well as state tax credits.

Then, lo and behold, on December 12, 2013, Think Progress — CAP’s propaganda machine — announced, “Ford Motor Company and General Motors Company will receive a combined \$50 million to support their respective manufacturing facilities that produce electric cars.” This was from the stimulus-created 48C Program, of which GM’s share was \$20 million for “its Detroit-Hamtramck Assembly Plant where the company manufactures Extended Range Electric Vehicles— Chevrolet Volts and the Cadillac ELR electric luxury coupe — along with internal combustion cars.”

**#17) Xcel Energy:**

What’s interesting is that Xcel Energy was in the loop with Cogentrix Energy, a subsidiary of Goldman Sachs, which in September 2011, snagged a \$90.6 million GOVT stimulus loan for the Alamosa Solar Generating Project. Then on July 16, 2012, Cogentrix bagged a \$34.6 million stimulus grant (free taxpayer money) from the 1603 Grant Program — I’m assuming this is for the same project.

What’s interesting (see graph with Goldman Sachs stimulus loans) is that the partners involved in this project included utility Xcel Energy (XEL), which signed a 20-year contract to buy enough CPV power to supply electricity to 6,500 homes; and Amonix, the California-based company that will supply the CPV panels — Amonix (complete with Obama buddies) was subsidized with \$29.6 million of taxpayer money before it went bankrupt in July 18, 2012. What a scam...

Also, according to MinnPost.com, in 2010, Minnesota’s Senator Al Franken visited Mulroy’s Body Shop “to highlight the use of federal stimulus funds in creating jobs and boosting the alternative energy economy.” It turns out that the owner had 174 solar panels installed on the roof of his Nicollet Avenue body shop in South Minneapolis. And that “Minneapolis-based Solarflow Energy installed the system and is leasing the equipment to Mulroy’s under contract with Xcel Energy. The lease agreement also includes installation, maintenance and support. The federal stimulus funds deliver a grant-in-lieu of a 30 percent tax credit on the value of the installation to



1 Solarflow.” Solarflow start-up was partially funded through an Xcel Energy Renewable  
2 Development Fund grant of \$1.5 million.

3 While Xcel was omitted from the \$3.4 billion in stimulus smart-grid grants in 2009, for their  
4 highly touted \$100 million “Smart Grid City” project in Boulder, Colorado did snag about \$24.2  
5 million in federal economic stimulus money for “Smart Grid” updates to the state’s power grid and  
6 customer meters. Still, Xcel Energy is slapping ratepayers with the bill: “In 2010, Xcel found itself  
7 asking Colorado regulators for permission to recoup \$44.5 million in rate increases, but the  
8 Colorado Public Utilities Commission only gave it \$27.9 million,” as documented by  
9 GreenTechMedia in 2012. And it seems that while they were seeking another \$16.6 million in 2012  
10 for their Smart Grid City mess, “The Colorado Public Utility Commission (recently) denied Xcel’s  
11 request to recover a big chunk of that \$45 million,” reported Smart Grid News in August 2013.

12 In closing...

13 What’s clear is that spending millions to elect the right president, while giving big money to  
14 other high-ranking politicians, pays big time. This game is played by also hiring high-powered  
15 lobbyists, while employing think tanks and organizations that have significant clout. Sadly, this is  
16 how crony capitalism works — more like corporate welfare, because this game is rigged for the  
17 ultra rich and huge corporations, screwing the taxpayer all the way to the bank. In the meantime,  
18 career politicians continue in power; thus fueling the never-ending corrupt cycle of political  
19 payback.

20 Along the way, what counts is either a position or connection (friends and family) inside the  
21 White House or a particular government department. It’s all about “access and influence” — thus  
22 those that play the game well are guaranteed millions, if not billions, of taxpayer money. It’s not for  
23 the feeble minded, the regular law-abiding citizen, nor the small business worthy of American  
24 taxpayer support.

25 **However, Americans have the power to vote the bums out and make it a FELONY for**  
26 **any politician, or their family members, to own stock market stocks or assets.**

27 In the Bay Area Elite arrogant asshole dynasties send their kids to Stanford University.  
28 Stanford puts the kids in asshole frat houses to train them to get away with rape and run

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1 monopolies. When they graduate they either go up the hill to Sandhill Road and start a venture  
2 capital clone operation or they get their frat friends on Sandhill Road to racketeer-fund their start-up  
3 or political campaign using money scammed from your parents pension funds. They only work with  
4 their frat buddies and insiders in a tribal 'old boys club' manner. They steal all the technology and  
5 markets they want because they control all of the tech lawyers and politicians via bribes and  
6 revolving doors. Stanford bosses keep all of this covered-up and covertly fund political campaigns  
7 to grease the wheels of political corruption. They then sexually extort some Stanford interns in  
8 Rosewood Hotel rooms, get the most 'trophy wife' ones pregnant, and start the cycle all over again.  
9 This is how "Silicon Valley" operates.

**EXHIBIT 42 - David Brock Can Kill You, And Destroy Your Democracy, With A Single Facebook Page**

- You may not have the right kind of education, technical savvy or psychology PhD to understand how this is possible but you know that Silicon Valley is doing something very, very bad to you..right?

[Michael Wade](#) reveals that the dealings that have been revealed between Cambridge Analytica and Facebook have all the trappings of a Hollywood thriller: a Bond villain-style CEO, a reclusive billionaire, a naive and conflicted whistleblower, a hipster data scientist turned politico, an academic with seemingly questionable ethics, and of course a triumphant president and his influential family. Facebook, Google and Netflix executives and venture capitalists set out to use their data to push their ideology and politics on the world using psychological tricks embedded in their media. You, and Congress, are not smart enough to see how they are doing it. The cow at the meat processing plant is not smart enough to see that, at the end of the week, a metal rod will be shot into his skull and he will be gutted. The public and the cow are both being harvested. One for their privacy, the other for their meat.

The public still buys devices with microphones and cameras on them. The public still uses sites and programs that you have to "log in" to so that you can be data-harvested. Cows can't read newspapers so they can be excused for not knowing that millions of cows before them were chopped up. The news tells the humans that all of the products of Silicon Valley spy on, and abuse them, yet the humans still keep using those products and buying those phones that are just glorified listening devices. One could argue that the humans are dumber than the cows because the humans seem to be incapable of considering the consequences of their digital actions even after being warned.

Much of the discussion has been on how Cambridge Analytica was able to obtain data on more than 50 million Facebook users – and how it allegedly failed to delete this data when told to do so. But there is also the matter of what Cambridge Analytica actually did with the data. In fact

1 the data crunching company's approach represents a step change in how analytics can today be used  
2 as a tool to generate insights – and to exert influence. They proved that Facebook has a file on every  
3 American.

4 For example, pollsters have long used segmentation to target particular groups of voters,  
5 such as through categorizing audiences by gender, age, income, education and family size.  
6 Segments can also be created around political affiliation or purchase preferences. The data analytics  
7 machine that presidential candidate Hillary Clinton used in her 2016 campaign – named "Ada" to  
8 target groups of eligible voters in the same way that Barack Obama had done 4 years previously. In  
9 fact Google and Facebook manipulated culture, the internet and elections and pretty much, **alone**,  
10 illicitly put Obama in the White House in exchange for Quid Pro Quo.

11 Cambridge Analytica was contracted to the Trump campaign and provided an entirely new  
12 weapon for the election machine. While it also used demographic segments to identify groups of  
13 voters, as Clinton's campaign had, Cambridge Analytica also segmented using [psychographics](#). As  
14 definitions of class, education, employment, age and so on, demographics are informational.  
15 Psychographics are behavioral – a means to segment by personality.

16 Huge numbers of kids have committed suicide because of posts on Facebook. This is widely  
17 reported. What is not widely reported is that huge numbers of adults have committed suicide  
18 because of organized attacks on them operated by Media Matters, Fusion GPS and hundreds of  
19 other hired political attack services.

20 This makes a lot of sense. It's obvious that two people with the same demographic profile  
21 (for example, white, middle-aged, employed, married men) can have markedly different  
22 personalities and opinions. We also know that adapting a message to a person's personality –  
23 whether they are open, introverted, argumentative, and so on – goes a long way to help getting that  
24 message across and/or to control the intent of others.

### 25 **Understanding people better for better election manipulation**

26 Eric Schmidt, David Drummond, Larry Page, Mark Zuckerberg, Kent Walker, and the other  
27 Facebook/Google oligarchs, are clinical sociopaths. The feds never arrest them, the fines against  
28 them are meaningless, corrupt U. S. Senators protect them, they have Jeffrey Epsteinian hookers-

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1 on-demand...there is no reason for them to end their crimes and every incentive for them to double-  
2 down on their machinations. They are above the law!

3 Traditionally, there have been two routes to ascertaining someone's personality. You can  
4 either get to know them really well – usually over an extended time. Or you can get them to take a  
5 personality test and ask them to share it with you. Neither of these methods is realistically open to  
6 pollsters. Cambridge Analytica found a third way, with the assistance of two University of  
7 Cambridge academics.

8 The first, Aleksandr Kogan, sold them access to 270,000 personality tests completed by  
9 Facebook users [through an online app he had created](#) for research purposes. Providing the data to  
10 Cambridge Analytica was, it seems, against Facebook's internal code of conduct (except if it pushes  
11 ideologies Zuckerberg wants), but only in March 2018 has Kogan been "banned" by Facebook from  
12 the platform. In addition, Kogan's data also came with a bonus: he had reportedly collected  
13 Facebook data from the test-takers' friends – and, at an average of 200 friends per person, that  
14 added up to some 50 million people.

15 However, these 50 million people had not all taken personality tests. This is where the  
16 second Cambridge academic, [Michal Kosinski](#), came in. Kosinski – who is said to believe that  
17 micro-targeting based on online data could strengthen democracy – had figured out a way to [reverse](#)  
18 [engineer a personality profile from Facebook activity](#) such as likes. Whether you choose to like  
19 pictures of sunsets, puppies, or people apparently says a lot about your personality. So much, in  
20 fact, that on the basis of 300 likes, Kosinski's model is able to predict someone's personality profile  
21 [with the same accuracy as a spouse](#).

22 Kogan developed Kosinski's ideas, improved them, and cut a deal with Cambridge  
23 Analytica. Armed with this bounty – and combined with additional data gleaned from elsewhere –  
24 Cambridge Analytica built personality profiles for more than 100 million registered US voters. It's  
25 claimed the company then used these profiles for targeted advertising.

26 Imagine for example that you could identify a segment of voters that is high in  
27 conscientiousness and neuroticism, and another segment that is high in extroversion but low in  
28 openness. Clearly, people in each segment would respond differently to the same political ad. But

1 on Facebook they do not need to see the same ad at all – each will see an individually tailored ad  
2 designed to elicit the desired response, whether that is voting for a candidate, not voting for a  
3 candidate, or donating funds. Google does this every minute of every day, to influence politics,  
4 because they get away with it with ease.

5 Cambridge Analytica worked hard to develop dozens of ad variations on different political  
6 themes such as immigration, the economy, and gun rights, all tailored to trick different personality  
7 profiles.

8 Behavioral analytics and psychographic profiling are here to stay, no matter what becomes  
9 of Cambridge Analytica This digital data rape industrializes what salespeople have always done but  
10 in the most sinister and evil way possible, by adjusting their message and delivery to the personality  
11 of their customers. This approach to electioneering – and indeed to marketing – will be Cambridge  
12 Analytica’s ultimate legacy of darkness.

13 **Protect yourself from tech Cartel corruption: Poison your data by always lying in**  
14 **online forms, use fake names and fake email addresses online, NEVER put your real address,**  
15 **city, phone, birth date or ANY other identifiable data online. Deny the Silicon Valley Cartel**  
16 **ANY ability to abuse your data!**

17 Read more: [Cambridge Analytica scandal: legitimate researchers using Facebook data](http://theconversation.com/cambridge-analytica-scandal-legitimate-researchers-using-facebook-data-could-be-collateral-damage-93600)  
18 [could be collateral damage](http://theconversation.com/cambridge-analytica-scandal-legitimate-researchers-using-facebook-data-could-be-collateral-damage-93600) ( [http://theconversation.com/cambridge-analytica-scandal-legitimate-](http://theconversation.com/cambridge-analytica-scandal-legitimate-researchers-using-facebook-data-could-be-collateral-damage-93600)  
19 [researchers-using-facebook-data-could-be-collateral-damage-93600](http://theconversation.com/cambridge-analytica-scandal-legitimate-researchers-using-facebook-data-could-be-collateral-damage-93600) )

20  
21  
22 **It is time to directly confront the Silicon Valley cultists and**  
23 **demand FBI, Congressional and SEC investigation!**

24  
25 **The Documented Characteristics of Silicon Valley Venture Capitalists and Tech**  
26 **CEO’s:**  
27  
28

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1 A horrific phenomenon of cultural depravity and white-collar crime is going unchecked in  
2 Silicon Valley because Silicon Valley controls the media and the politicians that are usually  
3 supposed to check these kinds of things. Millions of pages of news reports, documentaries,  
4 interviews and legal transcripts prove the following to be true:  
5

6 **Elitist Cult.** Silicon Valley elitists believe they are better than everyone else. Silicon  
7 Valley's Kleiner Perkins founder: VC Tom Perkins, said that poor people must be "*Nazi's*" for not  
8 accepting the "*superior intellect*" of VC's. Silicon Valley's Kleiner Perkins VC Vinod Khosla, took  
9 over California's favorite public beach, bribed the White House for "green cash" and got sued for  
10 arrogance by a horde of public interest lawsuits. Silicon Valley's Kleiner Perkins founder Ray Lane  
11 was indicted for tax evasion. Silicon Valley's Kleiner Perkins boss John Doerr was sued for sexual  
12 office abuse and running a "frat house". Most of the VC's and tech CEO's in Silicon Valley are  
13 charged with ethics breaches.  
14  
15

16  
17 **Prostitutes.** Silicon Valley males hire more hookers and "rent-boys" and fly more sex  
18 workers into the Bay Area than any other city in America. Google's and Tesla Investments  
19 executives were killed in sex and drug romps with hookers. Google's Eric Schmidt ran a huge "sex  
20 penthouse" and promotes infidelity and "anti-marriage". Google's search engine rigging boss died  
21 at the hands of one of his hookers. The Silicon Valley VC's had the Rosewood Hotel built at the  
22 end of Sandhill Road as a place to take interns and hookers to for sex. Underage sex efforts operated  
23 by these VC's and Tech CEO's have created the "Pizzagate" phenomenon.  
24  
25

26 **Rapists and Sexual Coercion of Employees.** Young interns are "sent up the hill" by  
27 Stanford to the VC's Sandhill Road offices to become sexual playthings for the VC's at the  
28 Rosewood Hotel. Ellen Pao sued Kleiner Perkins over the sexual "rape culture" that they promoted.

Thousands of women have written books and articles about the sexual intimidation they are subjected to by Silicon Valley VC's and their tech CEO's. VC's Joe Lonsdale, Micheal Goguen and hundreds of others have been charged with rape and sex trafficking. Stanford University gets "endowments" and "gifts" for hushing rape culture and intern-fluffing up.

**Assholes.** Fraternity *House Take-What-You-Want* culture is re-percussively promoted in the bars, clubs, meetings, conferences and emails of the VC's and CEO's. The TV Show: **Silicon Valley**, underscores the point of the dangers of infectious asshole-ism in Silicon Valley.

**Clones.** They assemble those around them that have the same stereotypical facial structure. In a room full of ordinary people and Tech VC's, the VC's faces stand out as Hollywood-type character-cartoon duplicates of each other.

**Sexual deviance and extremism.** Google's founders have all had extreme sex scandals involving cheating, 3-way sex, divorces over abuse, forced anal sex and other outrages. Their teachers at Stanford have had to quite over their sex scandals. Their willingness and infatuation with sexual extremes defines them as moral degenerates who care little about laws and ethics.

**Insider Dysfunctional Parents.** The majority of the VC's and Tech CEO's come from rich dynastic families who are cultism-like devoted to "the family bloodline" and run by male oligarchs who believe in a rape culture/oligarch ethos. This belief system is passed on to their children. The oligarch parents threaten to cut endowments to Stanford University if Stanford punishes their son's Frat Houses for date rapes.



1       **Tone Deaf.** Silicon Valley Tech people exist in a conceptual ideology reinforcement bubble  
2 by never interacting with, or reading information or news from, anyone outside of their group. VC  
3 Tim Draper spent vast amounts of money trying to make Silicon Valley it's own country in order to  
4 systemize the Silicon Valley tunnel-vision bubble. They want to secede from America because they  
5 are offended by normal people who they consider to be low-class and unworthy.

6  
7       **Murders.** Rajeev Motwani taught the Google founders how to build Google and was found,  
8 mysteriously, floating, dead, in his Silicon Valley swimming pool. Silicon Valley's Gary D. Conley  
9 reported John Doerr and Elon Musk for corruption and was found with a bullet in his head behind  
10 Beale Air Force base. Three top Tesla engineers reported corruption at Tesla Motors and then  
11 suddenly died in a plane crash next to Tesla's factory in San Carlos. There are over 100 mysterious  
12 deaths associated with people who had conflicts with Google, Kleiner Perkins and other Silicon  
13 Valley oligarchs.  
14

15  
16       **Arrogant.** Self-Centered Narcissists. Elon Musk has spent over a billion dollars buying  
17 exclusive Google, Twitter, MSM and Facebook hype about himself. Every Tech CEO has a multi-  
18 million dollar PR agent assigned to make them look like "Gods of Industry". They regularly hold  
19 "Babes and Ball's" parties and sex parties in Woodside that require women to beg for their money.  
20 They were trained to be "assholes" and "abusive dominants" via the Stanford Rape/Frat Culture.  
21  
22

23       **Misogynists.** All White-Male-Controlled with frat house pasts. Women are used As Sex  
24 Objects and *Window Dressing*. The largest number of anti-women news stories, jock/bro blog  
25 reports and charges for abuse come from Silicon Valley. VC Steve Westly's CEO friend is  
26 notorious for kicking his girlfriend hundreds of times because she "sassed" him. Almost of of their  
27 Divorce filings include abuse charges against the man.  
28

1  
2 **Manipulation of Employees.** Silicon Valley cartel companies practice Scientology-like  
3 indoctrination and “cultural programming” of employees. These highly impressionable naive young  
4 employees are kept in “controlled environments”, sent to “mindfulness programming workshops”  
5 and told what kind of political opinions they should have. Tight-knit groups of females experience  
6 [synchronized menstrual periods](#) (  
7 <http://www.nature.com/nature/journal/v229/n5282/abs/229244a0.html> ) over time, cohesive Google  
8 and Facebook employee groups engaged in decision-making [discount dissenting viewpoints](#) in the  
9 interests of consensus, and that couples who stay together long enough [begin to look alike](#). A [new](#)  
10 [study](#) has captured another group phenomenon in Silicon Valley and chronicled in humans’ natural  
11 habitat: “[group brain synchrony](#)”. This is a CIA-like brainwashing technique exploited to get all  
12 Google/Facebook/Twitter employees to rapidly adopt the same political views.  
13  
14

15  
16 **Racists.** Silicon Valley companies have the lowest rates of hiring, or promoting blacks, in  
17 America even though they have a high population of blacks at the edge of their community.  
18

19 **Male insecurity issues.** They use **TED-Talks, SXSW** and **Syncronicity Events** as self-  
20 promoting hype in which to act like an apostle of a tech religion. They buy Tesla cars as a badge of  
21 arrogance and mock any male who does not own what they own or who who did not go to Stanford  
22 or Yale. These pretentious and ostentatious boys are more inclined to brag about penis-size than  
23 family.  
24

25 **Blacklisting.** In the **AngelGate Investigation** and **Silicon Valley No Poaching Class**  
26 **Action Lawsuit**, Silicon Valley was exposed as an insider club that black-lists those who look  
27 different or are not part of the boys club.  
28

1           **Politically corrupt.** Silicon Valley has bribed more politicians than any other domestic  
2 region in history. They promote more immigration in order to get cheap labor for their tech  
3 companies. They steal their technology and bribe politicians to eliminate patent protections for  
4 small inventors that they steal from. Political Corruption and Bribery Is *The Norm* for these boys.  
5 Silicon Valley created a CIA knock-off called “In-Q-Tel” in order to use CIA technology to  
6 manipulate elections at Google, Facebook and Twitter. The 60 Minutes Episode called: “The  
7 Cleantech Crash” is about their multi-billion dollar scam using the Dept. of Energy as a slush-fund.  
8 They refuse to allow their MSM to report on their corruption and crony kickbacks, ie: Tesla Motors  
9 Funding, Off-shore tax evasion, Hooker networks, etc.  
10

11  
12           **Collusion.** In the **AngelGate Investigation, the Silicon Valley No Poaching Class Action**  
13 **Lawsuit**, and hundreds of other cases, Silicon Valley was exposed as an insider club that colludes  
14 to rig valuations, stock markets and employee poaching. They operate in herds within their peer  
15 group. They are not inclined to independent thinking. Kleiner Perkins has been caught placing  
16 moles and saboteurs inside competitors start-ups. They operate in herds within their peer group.  
17 They are not inclined to independent thinking.  
18

19  
20           **Stock Market Criminals.** Stock Market Pump-and-Dump, Flash Boy Algorithm  
21 Manipulation, Insider Trading, Market Rigging. The Securities and Exchange law violations and  
22 FTC monopoly law violations are vast in number.  
23

24  
25           **Burning Man Sex-and-Drugs Devotees.** Silicon Valley frat boys have a huge participation  
26 in the date-rage goings-on at Burning Man and buy extensive pheromone and skin contact delivery  
27 animal-tranquilizer drugs to use on young Burning Man girls.  
28

1       **Minimal Regard For Consequences.** Although their PR agents promote them as “green”  
2 and “socially positive”, it is all hype to get tax waivers and government hand-outs. Mark  
3 Zuckerberg’s take-over of San Francisco General Hospital’s brand was entirely a scam to get him a  
4 \$1 billion dollar tax evasion deployment. The Silicon Frat Boys act on impulse and try to buy off  
5 the collateral damage later.

6  
7       **Closeted homosexuals.** Using the tremendous funds they have at hand from their exclusive  
8 monopolies in public media, they push their trans-gender agendas through their bought-and-paid for  
9 politicians. This has resulted in a generation of sexually confused children who believe that they  
10 should cut their penises off. The top bosses at Facebook, Google, Twitter, Tesla and other  
11 companies are lying to the public about their sexuality and using hired wives, known as “beards”. If  
12 they lie about something so basic, one has to wonder what else they lie about.  
13

14  
15       **Thieves.** They steal most of their technology from small inventors who can’t defend  
16 themselves. They get inventions from Indian engineers and then ship them back to India before the  
17 employees can get any stock or IP rights. The tech CEO’s send their VC friends to competing start-  
18 ups to spy on competing technologies and steal it. The VC’s say they are just doing “due diligence”  
19 but they are actually sucking the competing start-up dry of IP and staff and making a clone of it  
20 under another name.  
21

22  
23       There are so many other awful things about the people of Silicon Valley. You get the  
24 picture. Silicon Valley is a swamp and a cesspool.  
25  
26  
27  
28

**EXHIBIT 43 – How The Public Is Helping Fight Back Against This Corruption**

**If you are a member of the public, do these things:**

- WRITE YOUR REGULATORY AGENCIES AND DEMAND INVESTIGATIONS AND PROSECUTOR INDICTMENTS OF THE SUSPECTS TODAY!

- DEMAND THAT THE LAW MAKE STOCK MARKET OWNERSHIP ILLEGAL FOR POLITICIANS AND THEIR FAMILIES! MAKE IT A FELONY FOR ANY PUBLIC OFFICIAL, OR THEIR FAMILY MEMBERS, TO OWN ANY SECURITIES OR STOCKS BECAUSE THAT IS HOW ALL MODERN BRIBES ARE PAID!

- WRITE CONGRESS AND DEMAND THAT CRIMINAL COMPANIES LIKE GOOGLE, FACEBOOK, TESLA, THE NVCA, ET AL, BE RAIDED AND SHUT DOWN BY THE FBI

**If you are a public official, do these things:**

- PAY Plaintiffs THEIR DAMAGES AND END THE BLOCKADE OF Plaintiffs BENEFITS AND PAYMENTS

- MAKE LAWS TO END THESE CORRUPTION CRIMES AND DARK MONEY BRIBERY SCAMS

- GET READY FOR EVERY MEMBER OF THE PUBLIC TO USE FBI-QUALITY FORENSIC AI SOFTWARE ON YOU, PERSONALLY, WITH THEIR HOME COMPUTERS, IF YOU DON'T DO THESE THINGS

In summation, here is where things now stand: New open-source, and free, public software let's any citizen get any corrupt politician arrested. Any voter can use the software from the comfort of their living room. The AI replicates itself (Like a benign digital version of Covid) across the entire web.

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1 Illegal and corrupt Congressional insider trading tends to be something we don't hear about  
2 until it's hit the big news networks and newspapers as the SEC goes for the throat of the accused. By  
3 then, unfortunately, those committing it have made their gains, usually in the multi-millions of  
4 dollars, and the damage has been done to the stock, its company, investors and the American Way.

5 Quite frankly, the jail time assessed doesn't correct the damage done, and the fines rarely aid  
6 the investors, or the voters, in getting their money and their democracy back. Many of those hurt are  
7 Average Joe's and Jill's who were just trying to save their retirement nest eggs. Shame is the tool  
8 that works best on the corrupt!

9 These crimes involves a Nancy Pelosi, Kamala Harris or Dianne Feinstein **investment**  
10 **banker husband** using information, which was not available to the public, buying and selling a  
11 company's stock in an underhanded manner. ***It is particularly onerous when one of those Senators***  
12 ***buys Tesla, Google, Facebook or Solyndra stock, and makes laws that only benefits Tesla,***  
13 ***Solyndra, etc, while sabotaging their competitor constituents.*** Because the dealings involved are  
14 pretty much done on the sly, it's been difficult, until now, for the governing body of the SEC to  
15 prove illegal insider trading, unless one of the cohorts tattles on the others or their actions become  
16 glaringly obvious. In some cases, a sharp mind around the action may take notice and become  
17 what's called a whistle-blower.

18 Previously, writes [Andrew Beattie of Investopedia](#): "... insider trading is often difficult for  
19 the SEC to spot. Detecting it involves a lot of conjecture and consideration of probabilities." That  
20 was the 'old days', though. Today, the new AI software can bust through these scams like a hot knife  
21 through butter!

22 With this new open-source, free, public spy agency-class software, detecting illegal insider  
23 trading is actually less complicated than it sounds.

24 To the eyes of this new super-powerful AI observer server bot and peer-to-peer databases, it  
25 is easy work.

26  
27 You, the citizen, just type the politician or agency employee name into a field and hit the "**analyze**"  
28 button. A few minutes later you receive a multi-page PDF report similar to an FBI report on the

target. You can either research the subject in more detail or send copies of the report to the FBI, GAO, OSC, SEC or other enforcement group.

The software is an automated AI temporal matching system which includes 24/7 analysis of all stock trades involving politicians to its information source, politician finances, communications and policy participators. it uses some of the same software code used by the CERN mega-research center in Switzerland.

**The technology Core Evaluation Points:**

- Analyst estimates - these come from what an analyst estimates that a company's quarterly or annual earnings will be. They are important because they help approximate the fair value of an entity, which basically establishes its price on the stock exchange.
- Share volume - this reflects the quantity of shares that can be traded over a certain period of time. There are buyers and there are sellers, and the transactions that take place between them contribute to total volume.

**One Way The AI Detects Congressional Insider Trades**

Metricized signs of illegal insider trading occur when trades occur that break out of the historical pattern of share volume traded compared to beneficiary participation's of those connected to company and political entity. Another clue of the illegal insider trading is when a lot of trading goes on right before earnings announcements. That tends to be a sign that someone already knows what the announcement is going to indicate, and it's an obvious violation. One module of the new software hunts these trends around-the-clock in an unmanned manner like a detective who never needs to sleep.

The software red alerts are issued when trades are linked closer to the actual earnings and politicians bills instead of what the predicted earnings were. In a corruption case, it's clear the trades - especially made by politicians close to the company - stemmed from information that was not readily available to the general public.

In other words, at the time an insider makes a trade, the trade has a stronger relationship to earnings guidance rather than to earnings results achieved.

**Part Of The Insider Trading Detection AI Uses 'Dynamic Time Warping (DTW)'**

1 In econometrics, which is a concept frequently used by quantitative analysts to evaluate  
2 stock market prices, dynamic time warping (DTW) is an algorithm that can be used for measuring  
3 similarity between two data sequences by calculating an optimal match between the two. This  
4 sequence "matching" method is often used in time series classification to properly "line things up."

5 The method, coupled with AI machine learning ensemble methods, can provide a clear path  
6 between the trades made by insiders and public data used to make the trades.

7 This is a product of artificial intelligence that has been expanded by Indexer, Splunk,  
8 Palantir and other firms fast becoming experts in products that can be used to advance the art of  
9 manipulating political and social trends in business and markets by using social media, financial  
10 data and news stories. The new software process has taken that sort of approach to the next level  
11 and targeted every member of Congress, their staff, family and friends. The first emphasis is on  
12 California and Washington, DC public figures.

13 In a hypothetical example, a group of executives failed to trade by industry standards by  
14 leveraging material non-public information and policy manipulation. Although consensus estimates  
15 called for higher commodity prices at the end of 2015, it appears key executives traded for their  
16 personal accounts as a result of the forecast provided by a specialist system within the firm that was  
17 adept at predicting prices alongside lobbyist manipulations. Flash-boy trading is now dirtier and  
18 powered by Google-class server systems.

19 In the hypothetical scenario the software aggregates executive trades in 2014 and 2015 and  
20 finds a strong link between buys and sells of executive stock options, which line up with material  
21 non-public estimates of commodity prices that were provided by the specialist system.

22 For example, in a "Exec Sell and Exec Buys" graph, a green line represents sells, while a  
23 black line represents buys. In the corresponding period, one finds a red line represents unrevised  
24 prices provided by the specialist system, and green line represents consensus estimates.

25 During Q1-2014, there was \$28M in purchases of executive stock options, while in Q2-  
26 2014, there was \$25M in sales of executive stock options. The specialist system called for Q3-2014  
27 commodity prices to make a precipitous decline going into the end of 2014. Remember, under this  
28 scenario, no revisions were made to the specialist systems' price forecast. In this example,



1 executives were afforded a significant advantage using price predictions from the specialist system.

2 In a final bullet chart, there was a dynamic time warping distance between trades and  
3 consensus estimates of 7.23, but this distance is only 2.19 when comparing specialist system  
4 estimates and executive trades. Please note, the closer the distance score is to zero, the more similar  
5 the trades are to the estimates they are measured against.

6 **We have applied this process to companies well-known for influence buying like,**  
7 **Google, Tesla and Facebook**

8 It's obvious that the tech executives involved did not follow industry standards in their  
9 actions and make public the "insider" information they had access to prior to the trades they made.  
10 The lobbyists they hired promoted this rigged trend and paid off Senators with perks. These are the  
11 kind of violations the SEC and other governing bodies can look to in attempting to protect the  
12 trading public and the integrity of financial marketplaces. Artificial intelligence tools are a major  
13 factor in assisting the tracking of insider trading. Eric Schmidt, of Google, does not look good under  
14 such circumspection.

15 "Every facet of our everyday lives has been impacted, infiltrated and greatly influenced by  
16 artificial intelligence technologies," says Vernon A. McKinley, a multi-jurisdictional attorney,  
17 based in Atlanta. "In fact, The U.S. Government and its multiple agencies have developed  
18 specialized intelligence units to detect, track, analyze and prosecute those unscrupulous individuals  
19 seeking to profit from the use of such tools, specifically in the financial industry, and to protect the  
20 integrity and strength of the U.S. economy and its investors." Now these tools are being turned  
21 against the corrupt!

22 The public can now detect trading anomalies in financial situations using this artificial  
23 intelligence software on their desktop computers. No public official will ever be able to do these  
24 kinds of corruptions, again, without getting caught.

25 This approach has already had an impact on how political insiders trade on Wall Street and  
26 in financial markets around the world.

27 **This technology can end this corruption in America forever!**

28 A module of the software uses data from The Center for Responsive Politics, ICIJ Panama

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1 Leaks records, Swiss Leaks records and FEC files to reveal covert routes. Jerry Brown, Dianne  
2 Feinstein, Nancy Pelosi, Kamala Harris and other famous California politicians own part of Tesla  
3 Motors, Facebook, Google, Netflix, YouTube and other companies they helped get government  
4 money for. All of their competing constituents have suffered for it or been put out of business by  
5 exclusive deals that only Tesla Motors, Facebook, Google, Netflix and YouTube got. That is a  
6 crime!

7 A large volume of forensic research proves that Silicon Valley Cartel tech firms receive  
8 benefits from politicians and politicians, at the same time, benefit from these firms.

9 This evidence on the exchange of benefits between politicians and firms proves an  
10 agreement between the politicians and the companies. This agreement, however, cannot be in the  
11 form of a written contract as writing direct fee-for-service contracts between a politician and a firm  
12 is considered bribery (Kroznor and Stratmann 1998; 2000). In addition, either party to this  
13 agreement might renege on its promise and the other party cannot resort to the courts.

14 Procon.org, for example, reports: "Less than two months after ascending to the United States  
15 Senate, Barack Obama bought more than \$50,000 worth of stock in two speculative companies  
16 whose major investors included some of his biggest political donors. One of the companies was a  
17 biotech concern that was starting to develop a drug to treat avian flu. In March 2005, two weeks  
18 after buying about \$5,000 of its shares, Mr. Obama took the lead in a legislative push for more  
19 federal spending to battle the disease. The most recent financial disclosure form for Mr. Obama . . .  
20 shows that he bought more than \$50,000 in stock in a satellite communications business whose  
21 principal backers . . . had raised more than \$150,000 for his political committees."

22 (<http://insidertrading.procon.org/viewresource.asp?resourceID=1580#obamaa>. See more examples  
23 from the Citizens for Responsibility and Ethics in Washington (CREW) report (2009).)

24  
25 The literature and our eye-witness experience proves that politically-connected Silicon Valley tech  
26 firms monthly obtain economic favors, such as securing favorable legislation, special tax  
27 exemptions, having preferential access to finance, receiving government contracts, or help in  
28 dealing with regulatory agencies. The evidence proves that Google's support, for example, can help

1 in winning elections. For example, firms can vary the number of people they employ, coordinate the  
2 opening and closing of plants, and increase their lending activity in election years in order to help  
3 incumbent politicians get re-elected. (See Roberts 1990; Snyder 1990; Langbein and Lotwis 1990;  
4 Durden, Shorgen, and Silberman 1991; Stratmann 1991, 1995, and 1998; Fisman 2001; Johnson and  
5 Mitton 2003; Ansolabehere, Snyder, and Ueda 2004; Sapienza 2004, Dinç 2005; Khwaja and Mian  
6 2005; Bertrand, Kramarz, Schoar, and Thesmar 2006; Faccio 2006; Faccio, Masulis, and McConnell  
7 2006; Jayachandran 2006; Leuz and Oberholzer-Gee 2006; Claessens, Feijen, Laeven 2008; Desai  
8 and  
9 Olofsgard 2008; Ramanna 2008; Goldman, Rocholl, and So 2008, 2009; Cole 2009; Cooper, Gulen,  
10 and Ovtchinnikov 2009; Correia 2009; Ramanna and Roychowdhury 2010; Benmelech and  
11 Moskowitz 2010.)

12       The software can see that the share ownership of politicians serves as a mechanism to quid-  
13 pro-quo their relationships with big tech firms, is as follows: The ownership of politicians plays  
14 multiple distinct (but not necessarily independent) roles; one that relies upon the amount of  
15 ownership and one that does not. First, as investors in firms, politicians tie their own interests to  
16 those of the firm. Thus, harming (benefiting) the firm means harming (benefiting) the politician and  
17 vice versa. By owning a firm's stock, politicians commit their personal wealth to the firm and  
18 reduce a firm's uncertainty with regard to their actions toward the firm. This will, in turn, enhance  
19 the firm's incentive to support the politician-owner during both current and future elections in order  
20 to prolong the incumbency period for as long as possible. Firms have their lobbyists push to be able  
21 to know the amount of ownership likely to be material to politicians. This knowledge, in turn,  
22 enables them to judge whether the politician's interest is aligned with the firm's interest and  
23 optimize quid-pro-quo.

24       The Political Action Committee (PAC) contribution of firms (which is a direct measure of  
25 benefits flowing from firms to politicians) is a significant determinant of ownership allocations by  
26 members of Congress. The ownership of Congress members in firms that contribute to their election  
27 campaigns is roughly 32.8% higher than their ownership in noncontributing firms even after  
28 accounting for factors that are associated with both ownership and contribution (such as familiarity,

1 proximity and investor recognition). Democratic members invest more (less) in firms that favor, i.e.,  
2 contribute more to, the Democratic Party. Politicians are partisan investors.

3 The committee assignments of politicians is a proxy for whether their relations with firms  
4 are enforced (Kroznner and Stratmann 1998). Silicon Valley tech firms like Facebook, Tesla and  
5 Google obtain private benefits out of their mutual relations with politicians. When the strength of  
6 the association between ownership and contributions at the firm level increases, the provision of  
7 government contracts to those firms increases.

8 embers of Congress, candidates for federal office, senior congressional staff, nominees for  
9 executive branch positions, Cabinet members, the President and Vice President, and Supreme Court  
10 justices are required by the Ethics in Government Act of 1978 to file annual reports disclosing their  
11 income, assets, liabilities, and other relevant details about their personal finances.

12 Personal financial disclosure forms are filed annually by May 15 and cover the preceding  
13 calendar year. The Center for Responsive Politics (CRP) collected the 2004–2007 reports for  
14 Congress members from the Senate Office of Public Records and the Office of the Clerk of the  
15 House. The Center then scanned the reports as digital images, classified the politicians' investments  
16 into categories including stocks, bonds, and mutual funds, and built a database accessible via a web  
17 query.

18 Using CRP's data, you can use the software to collect the shares in S&P 500 firms held by  
19 members of Congress between 2004 and 2007, for example. You can collect the stock ownership  
20 data for every firm that joined the S&P 500 Index any time between January 2004 and April  
21 2009; regardless of when it joined the index, and the software can obtain all the available stock  
22 ownership data for that firm between 2004 and 2007. Likewise, if a firm dropped out of the index at  
23 any time during 2004–2008, the software, nevertheless, will retain the firm in a sample for the target  
24 period. As such, the sample would include stocks in hundreds of unique firms owned by politicians  
25 between 2004 and 2007, for example.

26 Politicians are required to report only those stocks whose value exceeds \$1,000 at the end of  
27 the calendar year or that produce more than \$200 in income. They are CURRENTLY not required  
28 to report the exact value of the holding, but instead must simply check a box corresponding to the

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1 value range into which the asset falls. The CRP then undertakes additional research to determine the  
2 exact values of these stocks. When the Center makes these determinations, it reports them instead of  
3 the ranges and I use these values in my study. When only the range is available, you should use its  
4 midpoint as the holding's value. You would, thus have data on the stock holdings of hundreds  
5 politicians for that time period.

6 Using the software, you can search for all Political Action Committees (PACs) associated  
7 with tech firms. It then collects data on each contribution these PACs made to candidates (both the  
8 winners and losers) running for the Senate and House elections. Tricky corrupt Silicon Valley firms  
9 establish several PACs, each in a different location, and each of these PACs can contribute to the  
10 same candidate. In such cases, the software would total, for each candidate, every contribution he or  
11 she received from PACs affiliated with the same firm. To parallel the investment data sample  
12 period, for example, the software collects every contribution made from the 2003–2004 cycle up to  
13 and including the 2007–2008 cycle. Many Silicon Valley tech firms use deeply covert Fusion GPS,  
14 Perkins Coie, BlackCube, Psyops-type service to make very hidden additional payola payments to  
15 California politicians.

16 For sources, for example, the software collects government contract data from Eagle Eye  
17 Publishers, Inc., one of the leading commercial providers of Federal procurement and grant business  
18 intelligence and <http://www.usaspending.org>. Eagle Eye collects its contract data from Federal  
19 Procurement Data System–Next Generation (FPDS-NG), the contract data collection and  
20 dissemination system administered by the U.S. General Services Administration (GSA). FPDS-NG  
21 provides data on procurement contracts awarded by The U.S. Government . When these contracts  
22 are awarded to company subsidiaries, Eagle Eye searches for the names of their parent companies  
23 and assigns each subsidiary to its appropriate parent. The software collects both the number and  
24 aggregate value of government contracts that were awarded to sample firms between 2004 and 2007  
25 in this example time-frame..

26 The software reveals, for example, that Representative Maxine Waters (D-CA) is a ten-term  
27 member of Congress and a senior member of the House Financial Services Committee. She  
28 arranged a meeting between the Department of Treasury and One United Bank, a company with

1 close financial ties to Ms. Waters, involving both investments and contributions.

2 “In September 2008, Rep. Waters asked then-Secretary of the Treasury Henry Paulson to  
3 hold a meeting for minority-owned banks that had suffered from Fannie Mae and Freddie Mac  
4 losses.

5  
6 The Treasury Department complied and held a session with approximately a dozen senior banking  
7 regulators, representatives from minority-owned banks, and their trade association. Officials of One  
8 United Bank, one of the largest black-owned banks in the country that has close ties to Rep. Waters,  
9 attended the meeting along with Rep. Waters’ chief of staff. Kevin Cohee, chief executive officer of  
10 One United, used the meeting as an opportunity to ask for bailout funds.

11 . . . Former Bush White House officials stated they were surprised when One United  
12 Officials asked for bailout funds. . . . In December 2008, Rep. Waters intervened again, asking  
13 Treasury to host another meeting to ensure minority-owned banks received part of the \$700 billion  
14 allocated under the Troubled Asset Relief Program. . . . Within two weeks, on December 19, 2008,  
15 One United secured \$12.1 million in bailout funds. . . . This was not the first time Rep. Waters used  
16 her position to advance the interests of the bank. Rep. Waters’ spouse, Sidney Williams, became a  
17 shareholder in One United in 2001, when it was known as the Boston Bank of Commerce. In  
18 2002, Boston Bank of Commerce tried to purchase Family Savings, a minority-owned bank in Los  
19 Angeles. Instead, Family Savings turned to a bank in Illinois. Rep. Waters tried to block the merger  
20 by contacting regulators at the FDIC. She publicly stated she did not want a major white bank to  
21 acquire a minority-owned bank.

22 When her efforts with the FDIC proved fruitless, Rep. Waters began a public pressure  
23 campaign with other community leaders. Ultimately, when Family Savings changed direction and  
24 allowed Boston Bank of Commerce to submit a winning bid, Rep. Waters received credit for the  
25 merger. The combined banks were renamed One United. . . . In March 2004, she acquired One  
26 United stock worth between \$250,001 and \$500,000, and Mr. Williams purchased two sets of stock,  
27 each worth between \$250,001 and \$500,000. In September 2004, Rep. Waters sold her stock in One  
28 United and her husband sold a portion of his. That same year, Mr. Williams joined the bank’s board.

1 . . . One United Chief Executive Kevin Cohee and President Teri Williams Cohee have donated a  
2 total of \$8,000 to Rep. Waters' campaign committee. . . .On October 27, 2009, less than two months  
3 before One United received a \$12 million bailout, the bank received a cease-and-desist order from  
4 the FDIC and bank regulatory officials in Massachusetts for poor lending practices and excessive  
5 executive compensation . . . the bank provided excessive perks to its executives, including paying  
6 for Mr. Cohee's use of a \$6.4 million mansion . . ." (Crew report 2009,pp. 123–125)

7 Thanks to Crony quid-pro-quo revelations by an earlier version of the software, you can also  
8 see that Fisker Automotive, Inc.'s \$529 Million U.S. taxpayer Loan Approval by The U.S.  
9 Government was dirty. Fisker Automotive's Chief Operating Officer Bernhard Koehler pleaded  
10 with The U.S. Government in a panicked Saturday midnight hour email to receive a \$529 million  
11 loan as the company was 2 weeks from Chapter 7 liquidation, that it was laying off most of its  
12 employees, that no private sector investors would fund the company without GOVT guarantees, and  
13 that Fisker was unable to raise any further equity funding from independent private-sector investors  
14 given the company's financial condition. These statements were made to a Loan Officer at the  
15 GOVT . No private sector Loan underwriting (approval) committee would ever grant a low interest  
16 loan to a desperate buyer that had just confessed it was in a state of insolvency and was about to  
17 layoff most of its staff. Yet within a few weeks the GOVT would approve a \$529 Million Credit  
18 Facility to Fisker. Despite the GOVT Loan Officer official's sworn testimony at April 24th's House  
19 Oversight Committee that the GOVT used "same private sector underwriting standards when  
20 approving Fisker and other approved taxpayer Funded Loans" - likely perjury based in documents.

21 In a 'U.S. GOVERNMENT CONFIDENTIAL EMAIL': FISKER AUTOMOTIVE: August  
22 2009: Co-Founder Bernhard Koehler emails U.S. Dept. of Energy Loan Officer in Sat. midnight  
23 Panic admitting VC Firms all declined to invest, and company is out of cash. Weeks later the  
24 U.S. Department of Energy approves \$529M U.S. taxpayer Funded Loans to FISKER. NO  
25 PRIVATE SECTOR Lender would ever authorize a Loan for even \$5 Million let alone \$529  
26 Million after receiving this email stating private sector investors had examined the company and  
27 declined equity investments, that they might loan money as more secure Debt, and the Chief  
28 Operating Officer of the company further stating that the borrower is totally insolvent. (Weeks after

1 this email the U.S. Federal Government Dept. of Energy Loan Committee Approves Fisker  
2 Automotive as a credit-worthy borrow for \$529 Million in U.S. taxpayer Funded Loans). Fisker got  
3 the cash because President Obama said to "give it to them" in order to please his campaign  
4 financiers.

5 The same thing happened with Tesla Motors. Elon Musk and Tesla Motors were broke when  
6 GOVT gave them the money.

7 PrivCo CEO Sam Hamadeh stated in an official statement: *"The documents obtained by*  
8 *PrivCo paint a picture of how an insolvent,unproven automaker received \$192 million in taxpayer*  
9 *funding. The U.S. Government made a loan that no rational lender would have made. This loan was*  
10 *the equivalent of staying execution on a company that was terminally ill to begin with."* Tesla and  
11 Fisker could not have been taxpayer funded unless bribes and criminal quid-pro-quo was underway  
12 by President Obama and the U.S. Senator insider traders.

13 WITNESS Vehicle's had been the first to initiate negotiations to retask the NUMMI plant in  
14 Fremont, California after Elon Musk went on the record saying the NUMMI Plant was worthless to  
15 Tesla. Dianne Feinstein's chief of staff then threatened WITNESS and warned them to cease action  
16 on NUMMI. Shortly thereafter, Tesla announced they had acquired the NUMMI plant which  
17 Dianne Feinstein's family owned a business interest and she had arranged for Tesla to get funding  
18 and presided at the Tesla re-opening of the NUMMI plant.

19 **YOU** can fight back and destroy dirty oligarchs!

20 When the bad guys, and their lap-dog politicians, attack you because your products are  
21 better than theirs they are proving that they have to cheat to compete. They cheat with political  
22 bribes, black-lists, character assassination attacks, collusion and other anti-trust violating acts.

23 When your Senator holds stock market shares in companies that exist to profit on the backs  
24 of consumers, then it is impossible for that Senator to ever do anything but be corrupt!

25 As Mother Jones top editor says:

26 In 18 years of living here, I find zero evidence that the "City Family" is benefiting anybody  
27 but its members, developers, old-school socialites, and tech billionaires.

28 — Clara Jeffery (@ClaraJeffery) [February 14, 2020](#)



1 I can't even with how insular and incestuous and corrupt SF is. Mayor [@londonbreed](#)  
2 acknowledges she had relationship with DPW Nuru two decades ago and that they remained close  
3 friends <https://t.co/HEhIlulkyj>

4 — Clara Jeffery (@ClaraJeffery) [February 14, 2020](#)

5 Your public officials set-up, operated and maintained an organized crime scheme for  
6 personal profit at the expense of every taxpayer. They went after **Five Trillion** treasury dollars of  
7 your tax money for their personal interests via rigged stock market scams, rigged government  
8 contracts, exclusionary policy manipulations and other schemes that harmed American taxpayers.

9  
10 **You Owe It To Yourself And The Nation To Take These Crooks Down!**

11  
12 **You** can wipe them out, all by yourself, in 100% legal ways.

13 **You** can wipe them out even faster with crowd-sourced forensics and anti-corruption ai  
14 software!

15 **You** can join the rest of the public in an epic anti-corruption effort!

16 You must write FBI-quality criminal activities reports and file those reports, by certified  
17 mail, with every law enforcement and regulatory agency in every country in the world, including  
18 the FBI, OSC, GAO, EU, Interpol, FSB, UN, etc. CC the social media sites with your reports.

19 You can use basic private investigator websites to track and back-ground every person,  
20 organization and company involved in the corruption and trace their RICO law violations. You can  
21 provide that data to The U.S. Congress and every agency, with a copy to every social media posting.

22 You can now use open-source, free, collaborative NSA-class global databases that can track  
23 all of the locations, hookers, fake fronts, family trusts, bank accounts, stock market accounts, bribes  
24 and other goodies, of any corrupt public official, in minutes! You get that free anti-corruption  
25 software from GitHub, CodePen, Torrents, Onion Project, The Guardian, ICIJ and all over the web.

26 YOU open your own private investigator/citizen sleuth crowd-sourced investigations into  
27 the following:

28 - Every stock market account they or their family owns

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1 - Every Uber or Lyft ride they ever took for any meeting or transport of sex workers  
2 - Every flight manifest they appeared on  
3 - Every bank account they have ever held  
4 - Every lawsuit, divorce record and police record they have ever appeared in  
5 - Every trust fund they or their family holds  
6 - Every shell corporation they, or their family holds  
7 - Every person named in the Epstein Pedo book:  
8 <https://www.scribd.com/document/416207833/Jeffrey-Epsteins-Little-Black-Book-Redacted> cross  
9 referenced across all of the other databases and then supplied to the FBI and Child Protection  
10 Agencies  
11 - Every item in the Swiss Leaks that cross connects to their holdings  
12 - Every item in the Panama Papers Leaks that cross connects to their holdings  
13 - Every item in the WikiLeaks that cross connects to their holdings  
14 - Every item in the Snowden Leaks that cross connects to their holdings  
15 - Every sex trafficking incident that connects to each of them alone, and in groups  
16 - Every financial transaction between any of the parties on the master list and the character  
17 assassination and hit job firms of: Google, Univision, Gawker Media, Unimoda, Jalopnik,  
18 Gizmodo, Black Cube, Fusion GPS, Media Matters, Think Progress, IN-Q-Tel, K2 Intelligence,  
19 WikiStrat, Podesta Group, YouTube, Alphabet, David Drummond, Larry Page, Facebook, Correct  
20 The Recor, Stratfor, ShareBlue, Sid Blumenthal, David Brock, Eric Schmidt, Sunshine Sachs,  
21 Covington and Burling, BuzzFeed, Perkins Coie and Wilson Sonsini or their derivatives with  
22 common owners.  
23 - Every item in the Quest Leaks that cross connects to their holdings  
24 - Every tactical deployment, by a campaign financier, of the tactics listed in this manual: <https://www.cia.gov/library/readingroom/docs/CIA-RDP89-01258R000100010002-4.pdf>  
25  
26 - Every sex service that their credit card payments every connect too  
27 - Every real estate transaction that any name or company they, or their family, were involved  
28 in, tracks to

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1 ..... and hundreds of thousands of other information points about them that prove that they  
2 benefit from crimes that they engage in for others who engage in crimes using the America public  
3 policy system.

4 It all goes into shared 100% legal public collaborative databases that work like  
5 XKEYSCORE, or MS Access, or Oracle Databases.

6 The proof of collusion, organized criminal actions and raw covert corruption is indisputable.  
7 The actors are all the same people. The beneficiaries are all the same people. The communications  
8 between the parties all coordinate the same actions.

9 Demand their arrests, indictments, exposures and bankruptcies in public ads, letters to the  
10 editor, blog posts, bumper stickers, lawsuits, flyers, newsletters, email and every other outreach  
11 manner.

12 Say "*Fuck You*" to the Silicon Valley Oligarch 'Illuminati' scumbags and the crooked  
13 Senators and Governor's they bribed.

14 As one of the team said: "*Without breaking a single law and WITH the help of the largest*  
15 *law enforcement and investigative resources on the planet, I have killed off every single*  
16 *motherfucker that has come after me, including some of the largest entities in the world! I use*  
17 *lawsuits, federal investigations, news reports, whistle-blowers, new public regulations, anti-trust*  
18 *filings, tens of millions of crowd-sourced voters and unique AI-based forensics. I will find every*  
19 *person and organization on the globe that hates you, gather them together and aim them all at your*  
20 *life! Anyone who attacks me stays on the shit list for the rest of their lives plus the next 100+ years*  
21 *of internet time. You come for me, prepare to suffer. Every stock you buy is a notice to my team to*  
22 *bankrupt the company that you invested in. Even if I am dead, your punishment will be carried out*  
23 *by a legacy team of public volunteers. It may happen to you tomorrow or it may be a slow-drip over*  
24 *the next 15 years. Never stop looking over your shoulder. If you decided to cheat against my*  
25 *business rather than fairly compete against me, then start carving your tombstone. If you hired*  
26 *media attackers, expect 100 times what you did to me to come back at you and your family forever!*  
27 *I am fine with forgive-and-forget, except when it comes to criminal bullies: They are terminated!...*"

28 That is what happens when you try to kill members of the public

1 Show these oligarch crooks what billions of taxpaying voters with collaborative FBI-class  
2 forensics investigation software can do to their corrupt tech Cartel!

3  
4 **What To Do To Write Up The Dossier On Each Person And**  
5 **Each Corrupt Politician:**

- 6 1. Dig through their trash and buy their trash bags from the garbage man after  
7 they pick them up
- 8 2. Locate a beneficiary for a probate proceeding
- 9 3. Research current and / or historical property holdings
- 10 4. Identify mortgage information
- 11 5. Identify secured lenders
- 12 6. Identify related party property transactions
- 13 7. Determine current market value of real property
- 14 8. Locate bankruptcy filings
- 15 9. Retrieve and analyze bankruptcy records
- 16 10. Uncover improper relationships
- 17 11. Locate federal civil lawsuits
- 18 12. Locate federal criminal records
- 19 13. Retrieve and analyze federal civil and criminal records
- 20 14. Retrieve mug shots from arrest records
- 21 15. Provide independent analysis
- 22 16. Locate state and local criminal arrest records
- 23 17. Retrieve and analyze review criminal records
- 24 18. Provide peace of mind
- 25 19. Locate home phone numbers
- 26 20. Locate cell phone numbers
- 27 21. Identify owner of home or cell phone number
- 28 22. Determine owners of corporation

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- 1 23.Retrieve and analyze corporate records
- 2 24.Locate current or former executives
- 3 25.Interview current or former executives
- 4 26.Find and retrieve judgment and lien filings
- 5 27.Research familial history
- 6 28.Connect the dots
- 7 29.Locate witnesses for a civil or criminal lawsuit
- 8 30.Interview witnesses for a civil or criminal lawsuit
- 9 31.Find assets
- 10 32.Find current or historical boat registrations
- 11 33.Find current or historical aircraft registrations
- 12 34.Search for hidden assets
- 13 35.Conduct business intelligence
- 14 36.Discreet intelligence gathering
- 15 37.Determine connections between parties
- 16 38.Locate bank account information
- 17 39.Locate current or former employees of a company
- 18 40.Interview current or former employees of a company
- 19 41.Locate significant inheritances
- 20 42.Show you the big picture
- 21 43.Identify a will for an estate
- 22 44.Locate probate records
- 23 45.Identify foreign assets
- 24 46.Locate regulatory records
- 25 47.Identify regulatory actions
- 26 48.Identify professional licenses
- 27 49.Determine prior disciplinary records for professional licenses
- 28 50.Analyze state and federal political contributions

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- 1 51.Analyze state lobbyist records
- 2 52.Analyze federal lobbyist records
- 3 53.Identify potential whistle-blowers
- 4 54.Vet expert witnesses
- 5 55.Interview industry sources
- 6 56.Gather competitive intelligence
- 7 57.Identify related party business transactions
- 8 58.Retrieve and analyze non-profit financial filings
- 9 59.Knock on doors
- 10 60.Obtain and analyze Department of Labor Form 5500 Filings
- 11 61.Submit FOIA / FOIL requests to government agencies
- 12 62.Obtain driving record history (in applicable states)
- 13 63.Find current vehicle registrations
- 14 64.Find historical vehicle registrations
- 15 65.Make you look brilliant
- 16 66.Determine current market value of motor vehicles
- 17 67.Assist with jury selection
- 18 68.Background checks on prospective jurors
- 19 69.Analyze documents for potential fraud
- 20 70.Identify Risks
- 21 71.Identifying corporate relationships
- 22 72.Give you a competitive advantage
- 23 73.Identify Uniform Commercial Code filings
- 24 74.Foreign corporation research
- 25 75.Help you manage sensitive situations
- 26 76.Overseas litigation research
- 27 77.Identify stock ownership
- 28 78.Find facts

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79. Locate online resume

80. Identify online networking profiles

81. Locate historical video or news footage

82. Conduct historical newspaper research

83. Conduct mobile or stationary surveillance

84. Perform clandestine operations

85. Find undisclosed ties

86. Identify and retrieve U.S. Tax Court cases

87. Locate a missing person

88. Identify and confirm education history

89. Identify and confirm previous employment history

90. Scour the Internet

91. Research presence on social networks or message boards

92. We will tell you what those bastards are up to!

93. Send the IRS information about how Google, Netflix, Alphabet are cheating on their taxes and hiding money in Ireland and the Cayman Islands. Get the IRS to sue the oligarchs in tax court.

94. Enhance the publishing of research articles proving that Silicon Valley tech companies destroy the minds of children with tech addiction and brain manipulation and get parents to sue those companies for harming their children

95. expose every secret cash conduit that the oligarchs use to bribe politicians

96. Demand new laws in Congress to stop politicians from owning any stock because that is the #1 source of bribes

97. Use lip-reading software to see what they are saying or have an actual deaf-person do it

98. Photograph them with any hotties they are seen with and then face-track the hotties to see if they are hookers or ill-repute escorts

99. Use one of the many free on-line news publishing softwares and make a

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global online newspaper that constantly exposes their crimes

100. Write every federal agency and demand investigation and prosecution of the perps

101. Assemble the massive number of news reports about their sex scandals and distribute those reports as books, articles, documentaries and news aggregations to prove what a bunch of sick perverts these people are

102. Publish the speaker list from Techonomy, Davos, TED, Burning Man, etc. to show that it is always the same little group of arrogant assholes that self-promote their hype at each of these elitist events

103. Leave notices on the windshield of any of their Tesla's reminding them what douche-bags they are

104. Organize petitions and letter-writing campaigns to have the overtly corrupt ones removed from their jobs

105. Go to their share-holder meetings and hand-out flyers about their corruption

106. Hire Charles Spies ( <https://www.dickinson-wright.com/our-people/charles-spies?tab=0> ) to sue them

107. Hire Harmeet K. Dhillon ( <http://www.dhillonlaw.com> ) to sue them

108. Hire COA ( <http://www.causeofaction.org> ) to sue them

109. Hire law firms from China or Russia to sue them for a very low price

110. Hire Steven S. Biss ( <http://www.linkedin.com/in/steven-s-biss-6517037> ) to sue them

111. Blog about the corruption of the political targets every day with the day's news each day

112. Read their divorce filings in court records and see who else might help expose their corruption

113. Read their locations over the last 12 months -   
<https://www.protocol.com/government-buying-location-data>

114. Talk to every neighbor that has filed a complaint about them



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115.Hire *Pierce Bainbridge Beck Price & Hecht LLP* to sue them, especially tech media companies

116.Re-read all of the latest "How To Be A Private Investigator" books and brochures

117.Ask Paul Kangas in San Francisco how he investigates the corrupt

118.Go back to <http://www.pacer.gov> and read each of the lawsuits against them to get more clues about them

119.Put a card table and a pop-up booth outside their office and hand out flyers about them

120.Publish every stock market share they, and their family, owns

121.Produce a dossier on every corrupt partner of every Silicon Valley VC firm

122.Know that there are over 3000 additional forensic tools you can use to expose them 100% legally...

You can work with our peers to solve the ethics crisis in society.

We have hired the best investigators who used to work with the FBI, CIA, FTC, DOJ, SEC, GAO, IG and Interpol.

We have also been teaching every voter in the world how to be a top notch criminal investigator and how to use digital forensic AI tools to "follow-the-money" and bust these crooks. Imagine the entire resources of Palantir, XKEYSCORE, Splunk, Axciom and Taleo aimed at people like Zuckerberg, Hoffman, Musk and Schmidt. They will never survive it!

Every single asshole in Silicon Valley can expect to have accurate, highly professional, criminal charges and referrals filed against them with every federal law enforcement and regulatory agency. Those reports are being BCC'd to the news media and the public.

When you see reports like this book you can clearly see that **Every Tech CEO And Investor In Silicon Valley Is A Predatory, Parasitic, Sex Trafficking, Misogynist, Money Laundering, Politician Bribing, Exclusionary, Black-Listing Criminal.** Now the world will see the truth about them!


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[The Big \*\*Book\*\* ... - amazon.com](#)

 <https://www.amazon.com/Big-Book-Revenge-Serious-Getting/dp/0806521414>

The Big **Book Of Revenge**: 200 Dirty Tricks for Those Who Are Serious About Getting Even [George Hayduke] on **Amazon.com**. \*FREE\* shipping on qualifying offers. **Book** by Hayduke, George

[Is Pelosi's husband guilty of insider trading?](#)

 [https://www.americanthinker.com/blog/2016/04/is\\_pelosis\\_husband\\_guilty\\_of\\_insider\\_trading.html](https://www.americanthinker.com/blog/2016/04/is_pelosis_husband_guilty_of_insider_trading.html)

Is Pelosi's husband guilty of **insider trading**? By Rick Moran. In late October 2014, Nancy Pelosi's husband Paul purchased between \$100,000 and \$250,000 in stock from **green energy** company Sun ...

WASHINGTON—Chris Miller nearly doubled his \$3,500 stock investment in a renewable-energy firm in 2008. It was a perfectly legal bet, but he's no ordinary investor.

Reid's spokesman tried to defend the staffer, Reid's top energy policy adviser, by asserting that he had no influence over tax incentives for renewable energy firms.

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Under federal securities law, of course, it is not important whether the staffer had any influence over legislation, Sen. Reid or anyone or anything else.

If it can be shown that the staffer breached a duty of confidentiality in using "inside information" as the basis for buying and selling the stock, then he may very well be guilty of the crime of insider trading.

In May 2009, the Associated Press reported, Federal prosecutors and the FBI have been investigating possible illegal insider trading by two Securities and Exchange Commission enforcement attorneys who were in a position to receive sensitive information about agency probes of public companies.

1 Similarly, if the staffer had material information that the public didn't have and he took  
2 advantage of it in the buying and selling of securities, he could have committed a serious crime —  
3 as well as anyone he may have tipped off.

4 Reid's staffer has denied wrongdoing, but that should not be dispositive.

5 The Department of Justice, FBI and U.S. Securities and Exchange Commission ought to be  
6 investigating the staffer as well as any other potential insider trading violations described in the  
7 WSJ article.

8 At the very least, the staffer should be afforded the same opportunity as Martha Stewart to  
9 chat with federal investigators — that worked out so well for her.

10 Don't expect this to happen, however, as Sen. Reid and other members of Congress will no  
11 doubt quietly work to quash any investigation.

#### 12 **Big Brother Has Turned Green**

13 The environmental movement has cultivated a warm and fuzzy public image, but behind the  
14 smiley-face rhetoric of "sustainability" and "conservation" lies a dark agenda. The Greens aim to  
15 regulate your behavior, downsize your lifestyle, and invade the most intimate aspects of your  
16 personal life.

17 In this stunning exposé, Steve Milloy unveils the authoritarian impulse underlying the Green  
18 crusade. Whether they're demanding that you turn down your thermostat, stop driving your car, or  
19 engage in some other senseless act of self-denial, the Greens are envisioning a grim future for you  
20 marked by endless privation.

21 Steamrolling nearly all opposition with its apocalyptic predictions of environmental doom,  
22 the Green movement has gained influence throughout American society--from schools and local  
23 planning boards to the biggest corporations in the country. And their plans are much more  
24 ambitious than you think, says Milloy. What the Greens really seek, with increasing success, is to  
25 dictate the very parameters of your daily life--where you can live, what transportation you can use,  
26 what you can eat, and even how many children you can have.

27 Citing the tactics and goals of Green groups as explained by their own activists and leaders,  
28 *Green Hell* demonstrates:

\* How Green pressure campaigns threaten the safety of your home and your car, and public health overall

\* Why the election of President Obama portends a giant leap forward for coercive Green policies

\* Why Greens obstruct the use of all forms of energy--even the renewable sources they tout to the public

\* How wealthy Green elites stand to profit fabulously from the restrictions and regulations they seek to impose on the rest of us

\* How Green pressure campaigns are hamstringing the military and endangering our national security

\* Why big business is not only knuckling under to the Greens, but is aggressively promoting the green agenda to the detriment of its own stockholders

\* What you can do to help stop the great Green machine

A one-of-a-kind, comprehensive takedown of the entire environmental movement, *Green Hell* will open your eyes to a looming threat to our economy, our civil liberties, and the entire American way of life.

'*Green Hell* explains why Americans can't afford to fall for Al Gore's 'the debate is over' line on global warming. While we're all for the environment, *Green Hell* explains why we need to oppose the environmentalists."

--Fred Barnes, Executive Editor, the *Weekly Standard*

"*Green Hell* is the 'inconvenient truth' on extremist, growth-killing environmentalism. A must-read for those interested in keeping America free and prosperous."

--Steve Forbes, President and Chief Executive Officer of Forbes

"Regardless of whether you believe global warming is a fraud, the fact is that the current depression, the past spike in oil prices, and the coming technology of electric cars are all going to solve whatever problem exists. Liberals want to use climate change as an excuse to take over the economy and regulate everything and this book exposes their plans."

--Dick Morris, FOX News commentator and former political consultant to Bill Clinton

"This book describes why the world can't afford to fall for global warming alarmism and

1 environmental hysteria. Steve Milloy shows how to avoid the environmentalists' vision of our  
2 future."

3 --VACLAV KLAUS, President of the European Union and President of the Czech Republic

4 "Free market capitalism is still the best path to prosperity. *Green Hell* is a must-read for  
5 anyone who wants to keep America on that path and away from Soviet-style command-and-control  
6 environmentalism."

7 --Larry Kudlow, Host, CNBC's *The Kudlow Report*

8 Former President Barack Obama liked to portray himself as a politician watching out for the  
9 little guy.

10 But it looks like he spent much more time protecting his rich friends – and manipulating the  
11 government to help make them a fortune.

12 It was all part of a scheme that looks a lot like insider trading – or what author Peter  
13 Schweizer calls “smash and grab.”

14 In his new book, *Secret Empires: How the American Political Class Hides Corruption and*  
15 *Enriches Family and Friends*, Schweizer lays out how Obama used government regulations to help  
16 lifelong pals buy up companies for pennies on the dollar.

17 Basically, the Obama Administration would threaten and devalue companies, and Obama’s  
18 pals would be ready to swoop in and buy them on the cheap.

19 And apparently nobody ever stopped to consider the effect that this plot would have on  
20 ordinary shareholders – who lost millions – or the employees at the companies.

21 In an interview with Breitbart, Schweizer gives one shocking example – the case of Marty  
22 Nesbitt, who has been described as Obama’s “best friend.”

23 After Obama was reelected on 2012, Nesbitt set up a private equity firm called Vistria to  
24 invest in highly regulated industries – in other words, industries that Obama and his administration  
25 can help control.

26 Schweizer points to Vistria’s acquisition of online learning giant the University of Phoenix  
27 as an example of Obama and Nesbitt working together on a “smash and grab” deal.

28 The Obama Administration had threatened to withhold GI Bill money from the University of

1 Phoenix over the quality of its education, sending its share price tumbling.

2 Then, Nesbitt and Vistria were able to purchase the university for “three cents on the dollar,”  
3 Schweizer reports.

4 After the deal was made, the Obama Administration withdrew its threat to withhold federal  
5 funds.

6 Schweizer says Obama repeated the strategy throughout his presidency to enrich liberal  
7 billionaires like Tom Steyer and George Soros, who have both worked to ruin current President  
8 Donald Trump.

9 “Barack Obama smashes coal companies, [and] what do these guys do? They go in, they buy  
10 them for pennies on the dollar, and when the regulatory weight is lifted, their valuations increase,  
11 and they make a lot of money, and you see that pattern in all of these industries,” Shweizer said.

12 And what happens to other shareholders – the ones who aren’t friends with Obama? They’re  
13 left holding the bag when the companies are devalued.

14 Schweizer says that some of the ill-gotten gains realized by Obama’s friends eventually  
15 found their way to the Obama Foundation.

16 It’s a scheme that absolutely cries out for a federal investigation. But with so many Obama  
17 puppets still left in the government, we won’t be holding our breath.

**EXHIBIT 44 - How The Quid Pro Quo In This Case Works At The U.S. Dept Of Energy**

How do you give payola, funded by working class taxpayers, to millionaires that don't need it, to pay kick-backs for funding Obama's political marketing?

Easy: You use the **U.S. Department of Energy** as the world's biggest political slush-fund. This way, you get to pay bribes IN PLAIN SIGHT!

The U.S. Government bosses get to claim everything is on the "up and up" but EVERY SINGLE TIME, only the political campaign financiers get the money and their competitors get sabotaged. Neat trick, right?

Here is how it works:

**Quid pro quo** ("something for something" in [Latin\[2\]](#)) is a [Latin phrase](#) used in [English](#) to mean an exchange of goods or services, in which one transfer is contingent upon the other; "a favor for a favor". Phrases with similar meanings include: "give and take", "[tit for tat](#)", "you scratch my back, and I'll scratch yours", and "one hand washes the other". Other languages use other phrases for the same purpose.

Corruption in politics at The U.S. Government arises from the mismatch on Capitol Hill: squadrons of well-paid, experienced lobbyists versus GOVT offices where aides are overworked, underpaid and have to depend on those lobbyists for information about issues. We want to see GOVT offices with more aides, supervised by FBI agents, who would get better pay, to keep them on the Hill longer while they develop their own expertise. We would also close the metaphorical revolving door, through which staffers and lawmakers travel to make more money as lobbyists.

The need for campaign finance reform has always been an urgent one. The quid pro quo of shadow money and special interest campaign financing is at the root of corruption in this country, particularly at the Department of Energy. When government uses millions of taxpayer dollars to rent a bond hastily acquired and for no clear purpose from a 'party financier', that is the spectre of campaign finance related corruption showing itself. When construction companies that finance

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1 political campaigns to the tune of millions are being awarded public work contracts worth billions  
2 under questionable public tendering rules, that is campaign finance related corruption. When a  
3 branding company that provided 'free' billboards to a political campaign is given the lion's share of  
4 billboard and branding contracts under a new government, we see the spectre of corruption. And  
5 then of course there is the issue of abuse of state resources for campaigning, something we seem to  
6 have come full Animal Farm on.

7       Elon Musk, Solyndra, Fisker, Abound and over a hundred other wire transfers from The  
8 U.S. Government were quid-pro-quo payoffs to Obama financiers. The layers of the deals were  
9 complex but the money always ended up in the same few pockets.

10       The U.S. Government has a massive fake due diligence program which spends a hundred  
11 times more time and money than any bank undertakes to provide funds. All of that due diligence is  
12 a fraud. It is a smoke-screen to provide the appearance of "proper review" when, in each and every  
13 case, the funds were covertly already arranged in a back room deal.

14       All of those people that work on those due diligence efforts must feel like fools. Their work  
15 is pointless because the deals were already done in smoke-filled back rooms at Perkins Coie,  
16 Wilson Sonsini and Covington Burling lobbyist buildings. All of The U.S. Government staff own  
17 the stock of the company that "wins" the government cash and most of them leave the Department  
18 of Energy, right after the money is transferred, and go to work at that company or it's suppliers.

19       It is an EPIC crime!

20       Now, the need for reform is even more urgent, particularly considering the complexity of  
21 how capital moves in an oil and gas economy and the impact of that capital on political decision-  
22 making. (ie: "...One emerging party, for example, has been against renegotiation of the oil contract  
23 with Exxon, arguing that we should accept it and guard against exploitative arrangements with  
24 future contracts. When The U.S. Government recently revealed that it had recently hired a US firm  
25 to do what should have been done years ago, revise the decades-old Petroleum (exploration and  
26 Production) Act, it was casually revealed that the local firm the US company had partnered with is  
27 owned by the Presidential Candidate of the very new party that has – along with the PPP and  
28 APNU+AFC – refused to consider contract renegotiation, even in the wake of the damning Global



1 Witness report....")

2 By breaking the close bonds between lobbyists and congressional offices, lawmakers might  
3 become less beholden to the lobbyists' employers — the corporations, unions and special interests  
4 that underwrite American politics.

5 As value is in the eye of the beholder, the something being exchanged for another something  
6 may not be equal in value, instead skewed based on one's perspective.

7  
8 Democrats and their media masters are salivating over now having what they believe is a smoking  
9 gun to take down President Trump. Notwithstanding that this must be their hundredth smoking gun,  
10 and that each previous one misfired, they are hot on impeachment over this Latin term "quid pro  
11 quo."

12  
13 The [Washington Post](#), happy to let democracy die in darkness while they endeavor to overturn the  
14 last presidential election, is giddy over quid pro quo.

15  
16 In politics, quid pro quo is standard operating procedure. Take campaign contributions, for example.  
17 I contribute to Senator X because I want Senator X to support legislation favorable to my business  
18 interests. My money, something of value, will be exchanged for a tax break or new regulation,  
19 which is usually of greater value to me, as a quid pro quo, and perfectly legal and acceptable.

20  
21 A bundler for a presidential candidate raises millions of dollars for said candidate. If that candidate  
22 wins the presidency, the bundler may have a choice of any number of ambassadorships around the  
23 world. The value of the campaign cash is exchanged for a four-year stint living in the American  
24 embassy in London or Paris, attending parties and banquets. Something for something.

25  
26 Members of Congress do the quid pro quo thing amongst themselves all the time. I'll vote for your  
27 bill to build a military facility in your district if you support my bill creating an NSA data center in  
28 my district. In Congress it's called "horse trading."

1  
2 What about economic sanctions? The [Council on Foreign Relations](#), also known as Club Deep State,  
3 explains how economic sanctions work.

4 Governments and multinational bodies impose economic sanctions to try to alter the  
5 strategic decisions of state and nonstate actors that threaten their interests or violate  
international norms of behavior.

6 Economic sanctions are defined as the withdrawal of customary trade and financial  
7 relations for foreign- and security-policy purposes.

8 Sanctions take a variety of forms, including travel bans, asset freezes, arms embargoes,  
capital restraints, foreign aid reductions, and trade restrictions.

9  
10 Quid pro quo, something for something. If you want American money in terms of trade or aid, you  
11 had better behave, meaning do as we tell you to do in your political and economic decisions.  
12

13 Here are a few examples of quid pro quo economic sanctions.  
14

15 Economic sanctions were put in place against Cuba in 1958. Similar sanctions have been in place  
16 against North Korea since the Korean War. Economic sanctions have been in effect against  
17 Venezuela since 2015 and Sudan since 1997. These are quid pro quo moves -- behave, give up your  
18 nukes, provide human rights, or we will punish you economically. Something for something.  
19

20 Several of the ladies of [the Squad hinted](#) at cutting off aid to Israel after one of the gals was denied  
21 entry to Israel last summer. Presidential candidate [Bernie Sanders threatened](#), "Israel would have to  
22 'fundamentally change' its relationship to Gaza to receive aid if he is elected." Something for  
23 something, quid pro quo.  
24

25 Three Democratic senators [wrote a letter](#) to Ukraine's prosecutor general,  
26

27 expressing concern at the closing of four investigations they said were critical to the  
28 Mueller probe. In the letter, they implied that their support for U.S. assistance to  
Ukraine was at stake.

1  
2 They wanted something for something, quid pro quo.

3  
4 Then Vice-President Joe Biden, in a now well-known interview, [acknowledged](#), “I looked at them  
5 and said: I’m leaving in six hours. If the prosecutor is not fired, you’re not getting the money. Well,  
6 son of a b-tch. He got fired.” Quid pro quo, something for something.

7  
8 So, what did Trump do? He asked the Ukrainian President to investigate corruption, specifically  
9 foreign interference in a U.S. election. Biden was an afterthought in the conversation, but his pay to  
10 play corruption is fair game, whether or not he is running for president. Until he secures the  
11 Democratic party nomination, he is not Trump’s political opponent. What if Bernie or Pocahontas  
12 win the nomination?

13  
14 Trump has a constitutional duty as president to investigate corruption. The U.S. and Ukraine share a  
15 [treaty ratified in 1999](#) for “Mutual assistance in criminal matters.”

16  
17 There is also “The United Nations Convention against Corruption” of 2003, [signed by both](#)  
18 Ukraine and the U.S. And then finally is President Trump’s [Executive Order](#) signed in December  
19 2017, “Blocking the property of persons involved in serious human rights abuse or corruption.”  
20 Note that last word.

21  
22 Trump is doing his job as president, yet the Democrats and media howl in outrage over a supposed  
23 quid pro quo. But something for something is standard operating procedure in Washington, D.C.,  
24 even to the point of corruption as Joe Biden illustrated in Ukraine, China, and possibly Romania.

25  
26 The psychologists call this Democratic caterwauling “projection,” accusing others of doing what  
27 you are guilty of. Trying to impeach President Trump over a quid pro quo would be like impeaching  
28 him because he didn’t keep a campaign promise, something every elected official, past and present,

1 is guilty of.

2        Since its ruling in Buckley v. Valeo, the U.S. Supreme Court has expressed concern  
3 regarding corruption or the appearance of corruption stemming from political quid pro quo  
4 arrangements and the deleterious consequences it may have on citizens' democratic behavior.  
5 However, no standard has been set as to what constitutes "the appearance of corruption," as the  
6 Court was and continues to be vague in its definition. As a result, campaign finance cases after  
7 Buckley have relied on public opinion polls as evidence of perceptions of corruption, and these  
8 polls indicate that the public generally perceives high levels of corruption in government. The  
9 present study investigates the actual impact that perceptions of corruption have on individuals'  
10 levels of political participation. Adapting the standard socioeconomic status model developed most  
11 fully by Verba and Nie (1972), an extended beta-binomial regression estimated using maximum  
12 likelihood is performed, utilizing unique data from the 2009 University of Texas' Money and  
13 Politics survey. The results of this study indicate that individuals who perceive higher levels of quid  
14 pro quo corruption participate more in politics, on average, than those who perceive lower levels of  
15 corruption.

16        Quid pro quo is not a difficult concept to understand. Too bad the media doesn't endeavor to  
17 investigate and explain it. Your politicians don't work for you, they work for their own insider  
18 trading stock market holdings for themselves!

19        This is about a group of U.S. Senators, Silicon Valley Oligarchs, Detroit Oligarchs, Crooked  
20 Law Firms and Lobbyists who commit crimes in order to manipulate over a trillion tax dollars into  
21 their, and their friends pockets. They use "*stimulus*" funding and tell the public: "*don't-ask-*  
22 *questions, it's-an-emergency*" as a trick to fool you.

23        They use media monopoly tricks to try to shut out any other viewpoints. They push  
24 manufactured "*emotional trigger*" issues that they believe will get more tax money allocated to  
25 "*issue solutions*" that they, and their friends, happen to already own the vaccine, windmill, electric  
26 car and battery monopolies for.

27        They are felons, yet they control some of the offices of the agencies who are supposed to  
28 arrest them. Silicon Valley bought K Street lobby firms and U.S. Senators, gave them more 'Dark

1 Money' than history has ever seen and then had giant tech-law firms bribe, hit-job and blockade any  
2 attempts to arrest them.

3 ***The U.S. Government hired the Plaintiffs/victims, paid them only part of their money,***  
4 ***then defrauded the Plaintiffs by asking them to spend THEIR life savings and years of their time***  
5 ***on the government's federal project based on lies and false-promises from government bosses at***  
6 ***the White House, Congress and The Department of Energy. Then they took the assets Plaintiffs***  
7 ***were asked to invest, plus the money they owed Plaintiffs, and gave it to their friends and***  
8 ***financiers at Google, Tesla and other crony operations. When Plaintiffs reported the crimes to***  
9 ***the FBI, Congress and the SEC, government officials hired Fusion GPS, Gawker, Gizmodo,***  
10 ***Media Matters and other hit-job services to run "hit-jobs" on Plaintiffs and threaten their lives.***

11 As a group of domestic citizens, some of the Plaintiffs filed FBI complaints and lawsuits  
12 against The U.S. Government and their senior staff along with lawsuits against a rogue Silicon  
13 Valley off-shoot of the CIA called "In-Q-Tel". These citizens instigated Congressional corruption  
14 investigations and hearings against the most senior members of the State and Federal government.

15 These actions resulted in the termination of very famous public officials (Steven Chu, Eric  
16 Holder, James Comey, etc.) and their crony criminal embezzlement scams. These investigations  
17 almost resulted in the President being forced to leave office, mid-term, based on revelations of a  
18 massive crony campaign finance kick-back scheme which began to be exposed after the FBI raid of  
19 Solyndra.

20 The director of the FBI was fired for assisting in cover-ups related to this matter.

21 The Detroit car Cartel oligarchs had written the hard-wired money give-away for  
22 Department of Energy ATVM and LGP funds, exclusively for themselves, and wanted the money in  
23 exchange for Obama votes of union members.

24 Silicon Valley oligarchs heard about the deal and wanted half of it for themselves in  
25 exchange for web-rigging search engines and media for Obama-votes. In particular: Elon Musk got  
26 government money by bribing public officials and stacking hundreds of his friends and  
27 shareholders, ie: Steven Chu, Matt Rogers, Steve Westly, Steve Spinner's 'special friend', investor  
28 Google's employees, etc. on the staff of The U.S. Government and in the White House. In other

1 words, hundreds of Elon Musk's friends and financiers from Silicon Valley (Mostly from his  
2 investor: Google) were placed in the very offices that decided if he got the government funds.

3 Our team has FBI-class records, financial tracking, emails, stock market relay records and  
4 other forensic data that proves the assertions in this book.

5 The Plaintiffs can swear, warrant, certify and prove these assertions in front of: 1.) Congress  
6 in a live Congressional hearing or 2.) in Civil Jury trial, given non-compromised legal backing or  
7 3.) before a Grand Jury criminal hearing.

8 Musk bribed Senators, bought a President and had his buddies take over most of the  
9 Department of Energy. Lithium metals, and other rare earth mining materials, are monopolized by  
10 Elon Musk and his Silicon Valley Cartel, in rare-earth corrupt mining scams. Ford and Tesla had  
11 insiders (<https://forums.tesla.com/forum/forums/tesla-should-partner-somehow-ford> )

12 who kept trying to merge or JV them but the personality clashes kept it from happening. The  
13 Detroit Cartel and the Silicon Valley Cartel have cultural differences that always keep them at  
14 loggerheads.

15 The natural-born American domestic group of engineers Plaintiffs were attacked with a \$30  
16 million dollar+ retribution/political reprisal program contracted by White House political  
17 operatives, and their appointees, who were also the business competitors of the engineers.

18 The attackers used Fusion GPS-type character assassination smear campaigns (operated by  
19 their cronies at Google, Gawker, Gizmodo, Jalopnik and Facebook), NVCA black-listing, Solyndra-  
20 laundering, stone-walling, Lois Lerner-class agency manipulation and search engine rigging. In-Q-  
21 Tel turns out to be the only federally financed "charity" whose staff are also employed by each of  
22 the suspects in this case and who financed the suspects in this case.

23 It was revealed that White House executives ordered government agencies to harm members  
24 of the public and to reprisal with-hold public resources from the public. This was a violation of tort,  
25 RICO and anti-trust laws.

26 ***BUT...***

27 ***The victims fought back.***

28 With the encouragement of members of Congress they used 100% legal tools to interdict the

1 corruption.

2 Essentially; they helped the United States government sue itself!

3 **First**, with a unique new kind of pioneering federal lawsuit, victims established — FOR  
4 THE FIRST TIME IN LEGAL HISTORY — that political cronyism is a valid basis for a claim of  
5 arbitrary-and-capricious agency action under the Administrative Procedure Act. See: Federal Case  
6 One, (D.D.C. 2015).

7 **Second**, they prevailed in the United States Court of Appeals for the District of Columbia  
8 Circuit on their appeal of the district court's ruling that an agency may escape judicial review of its  
9 action by requesting a voluntary remand but refusing to reconsider its initial denial of an  
10 application. See: Case Federal Two, (D.C. Cir. 2017). The Washington DC Circuit agreed with the  
11 victims that an agency may only seek a remand if it promises to reconsider its initial decision. It is  
12 because of that victory that the government, under court and FOIA orders, is now reviewing  
13 charges filed by Plaintiffs and GAO, FBI, Inspector General and Congressional oversight offices are  
14 watching to assure effective ethics and transparency.

15 **Third**, these cases placed, on permanent public record, one of the most detailed  
16 documentation sets, ever assembled, about how modern political "Dark Money" conduits operate.  
17 Plaintiffs placed the records an evidence in global repositories and 'torrents' around the globe on  
18 public record forever. The legal team hired ex-FBI, CIA and SEC experts to track down covert bank  
19 accounts, revolving door bribes, insider stock trades and other payola between the victim's  
20 competitors and public officials. This documentation now prevents the use of those kinds of  
21 criminal efforts, in the future, by exposing their tactics to the public. This was one of the goals of  
22 the case: TO CREATE PERMANENT PUBLIC EXPOSURE OF THIS KIND OF CORRUPTION!

23 **Fourth**, the victim's team engaged in the interdiction and termination of corrupt agency  
24 executives, contractors and their financiers. This included some of the most well-known names in  
25 Washington, DC, at the time. Many of them were, and are still being, investigated and surveilled by  
26 the FBI, GAO, SEC and Congress.

27 **Fifth**, and most important, the effort put every corrupt political scheme on notice that they  
28 WILL be found out and interdicted!

1 The bottom line? The victims group WON on every single aspect of their public-interest  
2 goals but still have yet to be recompensed for their damages!

3 Now the "bad guys" have less options to engage in the corruption of our Democracy and the  
4 COVID dynamics have made all of them more desperate! Desperate crooks make bigger mistakes!

5 **The AI software this team helped create can now hunt down**  
6 **every single one of them and report them to every voter in the nation,**  
7 **every regulatory agency, every news outlet and every law enforcement**  
8 **agency.**

9 **Now with the push of a button on your smart phone or home**  
10 **computer, you can expose the criminals in our Democracy and end**  
11 **corruption!**



**EXHIBIT 45 - The Corrupt Crony-Capitalism Quid Pro Quo Payola**

Sycophant scumbags at The U.S. Government are covering up these crimes because they own stock in, and get contracts and revolving door jobs from, Elon Musk, Google, et al. The U.S. Government is a deep, dark, smug abyss of crony payola, kick-backs, market monopolization, bribes and insider corruption beholden to the tech cartel. Google, Facebook and Silicon Valley are a private government that is more powerful than The U.S. Government . They use The U.S. Government as their bitch! These people put mobster-like 'hit-jobs' on the victims and operated state-sponsored attacks against them because they reported the crimes to law enforcement.

If you don't believe that Silicon Valley is operated by an organized crime cartel of sociopath frat boys that are protected by famous Senators and public officials, who own their stock and get their campaign cash, then here is absolute proof of the crimes and the cover-ups that go all the way to the White House. We conducted an exhaustive, decades-long, investigation deep into the roots of modern political corruption and here is how it works and how to destroy it!

**EXHIBIT 46 - The Blockades Of The Victim's Legal Representation**

"Government staff and contractors have told us: "just sue us". This was their response to trying to resolve this issue.

That response, by government officials, is a felony violation of Constitutional law, human rights law, State and Federal public policy directives, the expectations of the national citizenry and the principles of Democracy.

The government response is, thus legally "non-responsive" and a threat to every voter and citizen.

Our previously filed demand, attached hereto as a PDF document under the title: "VICTIM DEMAND Jan 12 2020.pdf" proves that no care or attention was paid to Plaintiffs previously filed complaint by your office except to operate a cover-up campaign. Any cover-up campaign of this felony organized crime matter subjects each, and every, government employee and contractor involved in said cover-up to felony arrest and prosecution.

You have blocked Plaintiffs from getting a lawyer or getting any legal help. That is a felony violation of the law and an abhorrent violation of U.S. and State Constitutional and human rights.

The current tactics being used to prevent Plaintiffs from their legal rights include:

**A.** Plaintiffs have been "black-listed". Even though the law in California (Cal. Lab. Code § § 1050 to 1053) says that an entity can't prevent or attempt to prevent former workers from getting work or representation through misrepresentation, knowingly permitting or failing to take reasonable steps to prevent blacklisting, or make a statement about why an employee was discharged or left

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1 employment, implying something other than what is explicitly said, or providing information that  
2 was not requested: It is done every day in Silicon Valley. The "Silicon Valley No Poaching Black-  
3 List" class-action lawsuit was about this issue. Federal FAR Section 9.104-1 (d), and related laws,  
4 apply. Blacklisting is a key part of the IC Vendetta Cycle attacks. The victims also suffered damage  
5 to their rights under the Age Discrimination in Employment Act (ADEA) (29 USC Sec. 621, et  
6 seq.); the Americans with Disabilities Act (42 USC Sec. 12181, et seq.); the Civil Rights Acts - (42  
7 USC Sec. 2000, et seq.); the Davis-Bacon Act (40 USC Sec. 276a, et seq.); the Employee  
8 Retirement Income Security Act (ERISA) (29 USC Sec. 1001, et seq.); the Equal Pay Act (29 USC  
9 Sec. 206[d]) and other violations.

10  
11 **B.** Each and every law firm capable of handling Plaintiffs case has been contracted, paid and/or  
12 influenced so that they are “conflicted out” from representing Plaintiffs. Law firm Mofo was  
13 threatened if they helped Plaintiffs. Lawyer Amy Anderson was threatened and lost her license for  
14 attempting to help Plaintiffs. Every lawyer or law firm who attempts to help Plaintiffs are hired by  
15 Defendants, or their agents and threatened or compromised in order to prevent them from helping  
16 Plaintiffs because this case affects trillions of dollars of energy industry profits, the White House,  
17 billionaire oligarchs and multi millionaire corrupt Senators. In fact, this issue lies at the root of this  
18 entire corruption case. Sociopath over-moneyed Silicon Valley oligarchs have hire Morrison  
19 Foerster, Wilson Sonsini, Perkins Coie, Covington Burling and every other major law firm and  
20 lobbyist and told them to “kill everyone and destroy everything that I don’t like...”. These law firms  
21 (controlled by Mark Zuckerberg, Elon Musk, Larry Page, Eric Schmidt, Steve Westly, Vinod  
22 Khosla, Laurene Powell Jobs, Nancy Pelosi, etc. All of whom have nearly a trillion dollars of funds  
23 at their disposal) have carte blanche and unlimited payments to run coups, character assassination  
24 campaigns, money laundering and other crimes for the oligarchs. They have the staffing to do these  
25 things and zero incentive to not do crimes. These law firms are the dirty deeds teams for the  
26 mobster-like suspects and there is no law enforcement body with the will nor resources to stop  
27 them. It is a violation of the U.S. Constitution to tell Plaintiffs to “go get a law firm” when EVERY  
28 possible, equitable, law firm works for, and is massively compensated by, the criminals that need to

1 be sued. Both the politicians AND the tech oligarchs charged with these crimes have hired the very  
2 law firms that government agencies have told Plaintiffs to go out and hire.

3  
4 **C.** There is a precedent that was set in the US Supreme Court case: Gideon v. Wainwright, (1963)  
5 that clarifies that you have a right to a lawyer even if you don't have money for one. The Sixth  
6 Amendment, as applied to the states through the Fourteenth Amendment Due Process Clause gives  
7 one their Due Process rights. One needs to kill someone, though, to most easily get your free  
8 lawyer, since the court-appointed lawyer is rarely ever appointed, on citizens behalf, in a case like  
9 this. Even if a defendant is represented by an attorney of his or her choosing, he or she may be  
10 entitled to relief on appeal if the attorney did not provide adequate representation. A defendant must  
11 demonstrate that the attorney's performance "fell below an objective standard of reasonableness"  
12 and that this was prejudicial to the case. See: Strickland v. Washington (  
13 <https://supreme.justia.com/cases/federal/us/466/668/case.html> ) , 466 U.S. 668, 688-92 (1984). A  
14 few "free lawyers", that victims had tried, turned out to be working for the opposition side.

15  
16 **D.** The federal organization: <https://www.lsc.gov> is required to help but has refused because it's  
17 administrators were friends with, and appointed by, the public officials charged with corruption in  
18 this case.

19  
20 **E.** Plaintiffs have personally asked the Attorney General, The Director of the FBI and the U.S.  
21 Attorney's office for representation but they have been told not to respond because the case is  
22 politically embarrassing to major public officials and their corrupt Silicon Valley financiers.

23  
24 **F.** The government agencies who have told Plaintiffs that Plaintiffs should "hire a law firm and sue  
25 them", in order to resolve this matter, are the same government agencies that have cut-off, or  
26 blockaded Plaintiffs income sources in order to prevent Plaintiffs from being able to afford to hire a  
27 law firm to sue them.

1 **G.** A federal agency provided Plaintiffs with a list of “free lawyers”. Upon FBI-level investigation  
2 of every “free lawyer” on the list, (via their financial contributions, voting records, leaked emails,  
3 social media postings, event attendance, public records, social connections lists online and other  
4 surveillance data) they all worked for, or with the opposition interests and could not have possibly  
5 provided unbiased services. In fact, multiple lawyers have contacted Plaintiffs who turned out to be  
6 working for the opposition. They were sent in to delay, or redirect, Plaintiffs in order to keep the  
7 cases from being filed or properly prosecuted in order to protect the suspects. This is a common  
8 infiltration procedure widely documented in CIA, British secret service, Russian FSB and Snowden  
9 leaks documents on IC dirty tricks tactics.

10  
11 Agency staff were ordered to harm Applicants by manipulating their benefits in order to deny,  
12 delay, obfuscate and reduce their income as reprisal for their assistance to law enforcement in a  
13 political corruption and money laundering matter. Agency staff, ranging from the lowest level staff  
14 and up to the director headquarters offices, participated in this reprisal-vendetta-revenge action to  
15 harm Applicants.

16  
17 Applicant’s peers have filed DOJ and FBI criminal referrals, launched federal investigations and the  
18 assertions have been proven in numerous IG, FBI, Congressional and major news media  
19 investigations. Agency offices have failed to provide responsive FOIA requested data, hearing  
20 investigation data and fair responses because some of their staff are STILL operating a criminal  
21 cover-up which has now been update-reported to the FBI, Congress, the IG, the AG and  
22 investigative reporters.

23  
24 Other federal agencies have complied, verified and provided the requested deliverables. SSA and  
25 GOVT have pointed the searchlight of suspicion on themselves, laser-like, by their overt failure to  
26 comply, unlike every other agency. Ironically, the political financing of their executives and their  
27 personal relationships “happens” to be with the exact same Silicon Valley oligarchs under felony  
28 criminal investigations. The stock market brokerage records, family trust accounts, PAC trace-

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1 routing, Interpol records and SEC investigation records proves it!

2  
3 Unfortunately for the crooked agency staff, some Applicants have the authority, law enforcement  
4 credentials and training to arrest any person at their home or office and remand them to the FBI,  
5 DOJ or Sheriff. For example: Every “unsigned” SSA email is tracked to the individual author by  
6 their IP address, device IMEI, web camera, building key card, door camera, parking lot use chart,  
7 building camera, vehicle tracking circuits, text dba records, keyboard UI/UX patterns, motherboard  
8 ID #, DNS routing, stingray read-outs and a vast number of other metrics. Applicant investigation  
9 peers know the exact person that wrote every SSA email or document or file request. There is no  
10 such thing as an anonymous SSA email. Transparency is the Applicants middle name. The FBI and  
11 CIA people that SSA and GOVT insiders think are their “buddies” may actually be the  
12 APPLICANTS buddies!

13  
14 You will either give the Applicant his money and damages compensation, or suffer the  
15 consequences of the rapid acceleration of one of the largest investigations in modern history,  
16 supported by millions of voters with a shared peer-to-peer forensics social media network, the FBI  
17 and Congress. With the push of a single button, our latest info can be in the inbox of every blogger  
18 and independent investigative journalist in the world, in minutes.

19  
20 History has proven that non-corrupt portions of federal agencies and public service law and  
21 community action firms have executed on their willingness to expend millions of dollars of  
22 resources to fight this injustice. Every individual involved in this at SSA and GOVT are on a  
23 forensic database. No person at SSA or GOVT who uses our government as a garage sale for  
24 corruption favors or a kill mill for political reprisals will avoid the 100% legally executed  
25 consequences. They will be targeted and prosecuted even more profoundly than the Applicants were  
26 targeted with IC-type hit jobs.

27  
28 This felony criminal investigation case, is documented on thousands of websites and in dozens of

1 federal court case records in which Applicant won the case or was vindicated in the case and in  
2 thousands of news websites.

3  
4 Applicants researchers and investigators disagree with any decision by any agency which causes a  
5 delay in response which puts the applicants in jeopardy for their life and safety.

6  
7 Testifying, and/or reporting about this crime has resulted in the death, potentially by murder, of the  
8 following individuals who reported to the authorities about this crime matter:

9  
10 Rajeev Motwani; Gary D. Conley; Seth Rich; Philip Haney; David Bird; Doug Bourn; Misti  
11 Epstein; Joshua Brown; Kenneth Bellando; Moritz Erhardt; Imran Aliev; Kate Matrosova; David  
12 Drye; Vincent Foster; Kathy Ferguson; Duane Garrett; Eric S. Fox; Judi Gibbs; Berta Caceres;  
13 Suzanne Coleman; L.J. Davis; John Hillyer; Stanley Huggins; Sandy Hume; Shawn Lucas; Gary  
14 Johnson; John Jones; John F. Kennedy, Jr.; Stephen Ivens; Mary 'Caity' Mahoney; Eric Butera;  
15 Danny Casolara; John Ashe; Tony Moser; Larry Nichols; Joseph Rago; Ron Brown; Bob Simon;  
16 Don Adams; Peter Smith; Victor Thorn; Lori Klausutis; Gareth Williams; Daphne Caruana Galizia;  
17 James D Johnston; Dave Goldberg; Loretta Fuddy; Paul Wilcher; Gary Webb; Beranton J.  
18 Whisenant Jr; Stanley Meyer; Jon Parnell Walker; Tyler Drumheller; Barnaby Jack; Dominic Di-  
19 Natale; Barbara Wise; Ilya Zhitomirskiy; Jeff Joe Black; Robin Copeland; John Wheeler; Ashley  
20 Turton; Michael Hastings; Antonin Scalia; David Koschman; David Werner; Alex Okrent; Kam  
21 Kuwata; Larry Frankel; And hundreds more connected to this case who suddenly, and strangely,  
22 turned up dead in this case and, ironically, their deaths all benefit the suspects in this case.  
23 Applicants are also whistle-blowers who have been previously attacked in reprisal and who have  
24 been threatened with continued harm and death.

25  
26 Any delay, obfuscation, cover-up, FOIA refusal or other obscuring tactic by each and every member  
27 of an agency employee or contracting entity will be prosecuted on a person-by-person basis. Each  
28 employee or official who causes, by their action, further harm to the Applicants will be sued

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1 personally, have their assets garnished and will have a formal criminal referral authored and  
2 submitted to the FBI, DOJ, FTC, Congress and the news media. Applicants have sued the highest  
3 level personnel in the government for corruption, launched FBI and Congressional investigations  
4 against them and had them removed from their jobs and placed under permanent surveillance. The  
5 court and news records prove this fact. Do not imagine that any reprisal action by a public agency  
6 staffer will go unnoticed or unpunished by federal law enforcement, public forensics and major  
7 independent news media investigations.

8 The suggestion, by certain agency bosses, that one should "just file an IG report" is like  
9 telling someone to file a complaint against Hitler at the Nazi SS headquarters. You won't make it  
10 through the night! IG reports seem to accomplish nothing more than painting a target on your own  
11 back. Court records and news headlines prove that almost every citizen who reported similar  
12 political corruption through "official channels" was targeted with hit-jobs and economic  
13 blockades....ask Snowden!

14 What would you do if you found out that your politicians (ie: Dianne Feinstein, Nancy  
15 Pelosi, Harry Reid, Kamala Harris) had put over one hundred million dollars in their covert family  
16 bank accounts which they got from sabotaging your business, because it competed with them, and  
17 from blockading your money because their tech oligarch insiders told them to? Our forensic  
18 investigators can 'swear, warrant and certify' that the politicians did the asserted crimes and  
19 corruption.

20 Like a social *Terminex*(c) pest control service, we are eliminating every single tech asshole  
21 in Silicon Valley (like the roaches that they are) using 100% legal, law enforcement approved,  
22 resources.

23 You are probably asking: "***How Did Palo Alto, California Became Populated Entirely By***  
24 ***Assholes***"?

25 Why is the Tesla THE OFFICIAL CAR OF TONE-DEAF ARROGANT PRICK  
26 ASSHOLES!?

27 A glut of recent feature films ( ie: [The feature film: Assholes: A Theory](#) ) have excoriated  
28 the likes of Sand Hill Road and University Avenue scumbags...but pointing them out is not enough.



1 They must be exterminated. You can verify the following facts, yourself, via court records, police  
2 records, FBI reports, FOIA and Congressional records.

3 As U.S. Marshal Raylan Givens (Timothy Olyphant) famously opined on the TV show  
4 "**Justified**", "*You run into an asshole in the morning, you run into an asshole at lunch. You run into*  
5 *assholes all day*"; America on the precipice of the fallout of a monumental presidential election, it  
6 seems that assholes are not only everywhere you turn—in newspapers, on cable TV, at political  
7 rallies and protests, and all over social media—but that they, and their behavior, has been  
8 normalized because they own the media. Silicon Valley has a tsunami of "assholery" underway.  
9 This reality is covered in the philosophy of professor Aaron James' non-fiction book and new  
10 documentary aimed at both 1.) precisely defining the term "asshole," and 2.) investigating how  
11 those who fit that bill have increasingly come to dominate key spheres of modern public life.

12 Stanford University graduates are inspired by the likes of corrupt Elon Musk and corrupt  
13 Italian Prime Minister Silvio Berlusconi—the forerunner of the media-manipulating populist-  
14 criminal-strongman trend that's recently swept through Western nations—or passages discussing  
15 Facebook, Twitter and Google's prioritization of profit over their responsibility to safeguard  
16 democracy from hate speech and disinformation. Stanford and Yale have proven to be the key  
17 training grounds for beginner assholes. Eric Schmidt, Larry Page, Elon Musk, Jack Dorsey, Reid  
18 Hoffman, John Doerr, Vinod Khosla and Mark Zuckerberg are the embodiment of this problem.  
19 They flout all of the rules and standards of common decency. They have made it appear acceptable,  
20 and in fact rewarding, to act in the worst possible manner as a means of achieving one's selfish  
21 ends. Their Silicon Valley is the pit of American assholery. You can spot an asshole, easily, when  
22 they are driving the official car of assholes: A Tesla, but what about the ones that are more under-  
23 cover?

24 Most people that have been tech raped by a Palo Alto Sandhill Road scumbag feel the same  
25 way as Mr. Sun, who says: "*Silicon Valley Oligarchs must be punished. Without breaking a single*  
26 *law and WITH the help of the largest law enforcement and investigative resources on the planet, my*  
27 *task force has killed off every single motherfucker that has come after me with their anti-trust*  
28 *violating schemes, including some of the largest entities in the world! My peers and I use lawsuits,*

1 federal investigations, news reports, whistle-blowers, new public regulations, anti-trust filings, tens  
2 of millions of crowd-sourced voters and unique AI-based forensics. Our private investigators have  
3 found my every person and organization on the globe that hates the oligarchs. We gathered them  
4 together and aimed them all at the tech assholes! My rule is that Anyone who attacks me stays on  
5 the shit list for the rest of their lives plus the next 100+ years of internet time. When you  
6 Zuckerbergs, Larry Page;'s Elon Musk's, John Doerr's, Reid Hoffman's, etc., come for me, prepare  
7 to suffer. Every stock you buy is a notice to my team to bankrupt the company that you invested in.  
8 Even if I am dead, your punishment will be carried out by a legacy team of public volunteers. It may  
9 happen to you tomorrow or it may be a slow-drip over the next 15 years. Never stop looking over  
10 your shoulder. If you decided to cheat against our businesses rather than fairly compete against us,  
11 then start carving your tombstone. If you hired media attackers, expect 100 times what you did to us  
12 to come back at you and your family forever! We are fine with "forgive-and-forget", except when it  
13 comes to criminal bullies: They are terminated!

14 He has pledged millions of dollars, from his family trust, to the effort. His AI database lists  
15 every investor, VC and executive in Silicon Valley, their family data and their "asshole ranking".  
16 Most of the people attacked and ripped off by the tech oligarchs feel the same way. None of the  
17 victims have the monopolized control of the big tech law firms like the tech oligarchs do. None of  
18 the victims can afford to have an army of crooked law firms (ie: Mofo, Covington & Burling,  
19 Perkins Coie, Wilson Sonsini, etc.) working around the clock to enable financial crimes, corruption  
20 and Democracy abuses.

21 To grasp the argument that these people are assholes, one need only listen to the Silicon  
22 Valley Assholes's basic description. As many state, "*The asshole is the guy who allows himself*  
23 *special advantages in Bay Area cooperative life out of an entrenched sense of entitlement that*  
24 *immunizes him against the complaints of other people.*" In other words, he's the individual—  
25 generally male, although as John Cleese candidly admits, his mother probably was one too—who  
26 thinks the general rules don't apply to them because they're somehow smarter, better, or more  
27 special than their fellow citizens. James' example is a surfer who violates the right-of-way customs  
28 in the ocean. Yet the type is universal, whether in line at the grocery store, on the road in traffic, or

1 at work. They're the arrogant creeps convinced they're fundamentally superior, and thus free to  
2 conduct themselves in whatever way they see fit. That IS the essence of scumbag megalomaniacs:  
3 Eric Schmidt, Larry Page, Elon Musk, Jack Dorsey, Reid Hoffman, John Doerr, Vinod Khosla and  
4 Mark Zuckerberg!!!

5 The way "they see fit", of course, is often hateful, perverse and idiotic. The Assholes thrive  
6 in a bubble of trophy wives, rent boys and superficial TED conferences. In the midst of ongoing  
7 protests and debate over America's own domestic culture, which has long had a tradition of closing  
8 ranks and demonizing critics, every Silicon Valley employee ordeal sounds eerily familiar among  
9 every worker at Google and Facebook.

10  
11 Such attitudes, according to the Silicon Valley Assholes are created by Stanford University  
12 Fraternities which are breeding grounds for horrid group-think mindsets about women and sex. The  
13 tech financial sector encourages greed, ruthlessness, and vulgarity as the best way to get ahead.  
14 Google executives champion initiation-ritual abuse in service of its own greater good. You can see  
15 the movies: *Animal House*, *The Wolf of Wall Street* and *Full Metal Jacket* to see the underscore of  
16 the notion that these milieus are all rife with a similar brand of assholery in which arrogance and  
17 entitlement justify all manner of despicable ideas and deeds. Every major rape fraternity in the USA  
18 eventually sent those abusive boys to run Sandhill Road venture capital companies and Google or  
19 Facebook departments.

20 Every executive at Google knows that they are doing crimes, lying to Congress and the  
21 public and operating the biggest scam in history. That is why they will come up with any lie, re-  
22 interpretation of the facts or denial to hide the truth!

23  
24 Any Presidential Administration that puts sociopath, Epstein-like Eric Schmidt, Larry Page or ANY  
25 Google executive IN their Administration is either proving their tone-deaf lack of awareness of the  
26 facts or that their President is such a bitch to Google's campaign cash that they could not possibly  
27 be trusted by any world leader or any citizen. ( See: [https://therevolvingdoorproject.org/letter-to-](https://therevolvingdoorproject.org/letter-to-oppose-eric-schmidt/)  
28 [oppose-eric-schmidt/](https://therevolvingdoorproject.org/letter-to-oppose-eric-schmidt/) ) ( <https://nymag.com/intelligencer/2013/07/eric-schmidt-penthouse-new->

1 [york-photos-apartment.html](#) )

2       The Silicon Valley Assholes Process proves that real Silicon Valley VC and tech assholes  
3 probably don't know they are one; central to this condition is the certainty that all bad behavior is  
4 actually OK.

5       This is detectable in the media posts of workers from Greylock, Kleiner, Andressen and  
6 other tech asshole firms. Many of the tech interns freely admit that that they only pay attention to  
7 other social media users if there's a personal benefit to connecting with them. That type of me-first  
8 worldview is crucial to Palo Alto Sandhill Road's conception of twisted reality. Asshole-rich Silicon  
9 Valley America (where "exceptionalism" is ingrained from an early age) lives in contrast to  
10 asshole-light Canada (where folks tend to be more agreeable and accommodating)(Justin, though, is  
11 a novel kind of asshole).

12  
13       The most compelling—and enraging—realities concerns Silicon Valley, where Mark Zuckerberg  
14 and like-minded CEOs have bred a culture of trampling on competitors, laws, historical norms, and  
15 the bedrock tenets of democracy in pursuit of additional eyeballs, clicks, and revenue streams. In a  
16 place where young men team up in a desperate quest to develop the innovative next big thing that'll  
17 turn them into tech moguls ("bro-gramming"), nothing matters but the self-centered end goal. And  
18 though Facebook, Twitter, Google, Kleiner Perkins, Greylock and their ilk could alter this  
19 landscape by simply cracking down on the horridness that permeates their platforms, they choose  
20 not to because of the negative financial consequences and their lust for hookers, private jets and  
21 cocaine.

22       To travel through Silicon Valley is to take a gravely depressing survey of a 21st century in  
23 thrall—in several crucial arenas—to humanity's worst impulses.

24       So what is being done about this crisis of society?

25       We have hired the best investigators who used to work with the FBI, CIA, FTC, DOJ, SEC,  
26 GAO, IG and Interpol.

27       We have also been teaching every voter in the world how to be a top notch criminal  
28 investigator and how to use digital forensic AI tools to "follow-the-money" and bust these crooks.

Imagine the entire resources of Palantir, XKEYSCORE, Splunk, Axciom, Fusion GPS and Taleo aimed at people like Zuckerberg, Hoffman, Musk and Schmidt. They will never survive it!

Every single asshole in Silicon Valley can expect to have accurate, highly professional, criminal charges and referrals filed against them with every federal law enforcement and regulatory agency. Those reports are being BCC'd to the news media and the public.

When you see reports like these, you can clearly see that: **Every Tech CEO And Investor In Silicon Valley Is A Predatory, Parasitic, Sex Trafficking, Misogynist, Money Laundering, Politician Bribing, Exclusionary, Black-Listing Criminal:**

- Kleiner Perkins Insider Spills The Dirt On Outright Criminal Culture In Palo Alto

[Why Silicon Valley has a bro culture problem — and how to ...](#)

<https://www.vox.com/2018/2/5/16972096/emily-chang-brotopia-book-bloomberg-technology-culture-silicon-valley-kara-swisher-decode-podcast>

When **Emily Chang** interviewed venture capitalist Michael Moritz in 2015, she wasn't trying to "trap" him. But when the Sequoia Capital then-chairman suggested that hiring more women might ...

[The Universal Bro Code: The Bro Code Rules](#)

<https://valenciabrocode.blogspot.com/p/bro-code-rules.html>


The **Bro Code Rules** The **Bro Code** 1) You must always have your **bro's** back. No exceptions. 2) When your **bro's** girlfriend inquires about his whereabouts you know nothing, always. 3) You are only obligated to wingman for one **bro** per social event, after that the **bro** is on his own.

[Emily Chang on the 'Brotopia' of Silicon Valley, and how ...](#)

<https://www.geekwire.com/2018/emily-chang-brotopia-silicon-valley-companies-can-tackle-toxic-culture/>

**Emily Chang:** Brotopia, in my mind, perfectly encapsulates this idea of **Silicon Valley** as a modern utopia where anyone can change the world, make their own rules — if they're a man. But if you ...

["Oh My God, This Is So F---ed Up": Inside Silicon Valley's ...](#)

 <https://www.vanityfair.com/news/2018/01/brotopia-silicon-valley-secretive-orgiastic-inner-sanctum>


Adapted from Brotopia: Breaking Up the Boys' Club of **Silicon Valley**, by **Emily Chang**, to be published on February 6, 2018, by Portfolio, an imprint of Penguin Publishing Group, a division of ...

[Today's Tech Oligarchs Are Worse Than the \*\*Robber Barons\*\*](#)

 <https://www.thedailybeast.com/todays-tech-oligarchs-are-worse-than-the-robber-barons>


Today's Tech Oligarchs Are Worse Than the **Robber Barons**. Our **Silicon Valley Robber Barons**. ... "If you think **Silicon Valley** is going to fuel growing prosperity, you are likely to be ...

[Silicon Valley Billionaires Are the New \*\*Robber Barons\*\*](#)

 <https://townhall.com/columnists/victordavishanson/2017/08/17/silicon-valley-billionaires-are-the-new-robber-barons-n2369394>

Aug 17, 2017 **Silicon Valley Billionaires Are the New Robber Barons ... Silicon Valley Billionaires Are the New Robber Barons**. Victor Davis Hanson ... Yet most of the computers and smartphones sold by **Silicon** ...

[Hanson: \*\*Silicon Valley\*\* billionaires are modern \*\*robber barons\*\*](#)

 <https://www.mercurynews.com/2017/08/17/hanson-silicon-valley-billionaires-are-the-new-robber-barons/>

Aug 17, 2017 Hanson: **Silicon Valley** billionaires are the new **robber barons** ... Yet most of the computers and smartphones sold by **Silicon Valley** companies are still being built abroad — to mostly silence from ...

[Brotopia: Breaking Up the Boys' Club of \*\*Silicon Valley\*\* by ...](#)

 <https://www.goodreads.com/book/show/36288143-brotopia>

Brotopia by **Emily Chang** is a decent, but very surface level, examination of **Silicon Valleys** misogynist culture. Considering the significance of the topic, Brotopia feels like a missed opportunity to expose and critique the tech industry in a productive way; instead, I felt that only summaries were given on most topics.

[Silicon Valley's Giants Are Just Gilded Age Tycoons in ...](#)

 <https://www.thedailybeast.com/silicon-valleys-giants-are-just-gilded-age-tycoons-in-techno-utopian-clothes>

**Silicon Valley's** Giants Are Just Gilded Age Tycoons in Techno-Utopian Clothes . ... but the truth is they are a lot like the old **robber barons**. ... **Silicon Valley** executives were not just about ...

[The anonymous \*\*Silicon Valley\*\* satire that has stumped \*\*tech\*\* ...](#)

 <https://www.washingtonpost.com/news/morning-mix/wp/2015/12/02/the-anonymous-silicon-valley-satire-that-has-stumped-tech-world-insiders/>

Dec 2, 2015The plot follows **Crooks**, an ex-**tech** industry employee who finds spiritual deliverance in meditating on **Silicon Valley's** philosophies far, far away from the digital mecca itself. AD One passage ...

[Silicon Valley Wants To Read Your Mind - \*\*Crooks\*\* and Liars](#)

 <https://crooksandliars.com/2019/09/silicon-valley-wants-read-your>

But **Silicon Valley** should not be able to dictate the way these technologies are developed and deployed. If they do, it may radically reshape the way we identify as human. Garfield Benjamin, Postdoctoral Researcher, School of Media Arts and Technology, Solent University. This article is republished from The Conversation under a Creative Commons ...

[Silicon Valley's cocaine problem shaped our racist \*\*tech\*\* ...](#)

 <https://www.theguardian.com/commentisfree/2020/jan/30/silicon-valleys-cocaine-problem-shaped-our-racist-tech>

Jan 30, 2020**Silicon Valley** in the 1980s was the hub of an international drug trafficking network that fueled technological innovation and criminalized black people Charlton D McIlwain Thu 30 Jan 2020 06.00 ...

[Sex Scandal Toppled a \*\*Silicon Valley\*\* Chief. Investors Say ...](#)

 <https://www.nytimes.com/2018/07/27/technology/sexual-misconduct-silicon-valley.html>

Jul 27, 2018**Sex Scandal** Toppled a **Silicon Valley** Chief. Investors Say, So What? Mike Cagney was ousted as chief executive of Social Finance last year after questions about sexual misconduct. He has since ...

[Week in Tech: Sex Scandals and \*\*Silicon\*\* ...](#)

1  [https://www.nytimes.com/2017/12/01/technology/farhad-and-mikes-week-in-tech-sex-](https://www.nytimes.com/2017/12/01/technology/farhad-and-mikes-week-in-tech-sex-scandals-and-silicon-valley.html)  
2 [scandals-and-silicon-valley.html](https://www.nytimes.com/2017/12/01/technology/farhad-and-mikes-week-in-tech-sex-scandals-and-silicon-valley.html)

3 Dec 1, 2017**Silicon Valley's Sex Scandals.** Farhad: O.K., let's talk about the tech  
4 industry.Let's start with this week's episode of Problematic Men. A report by The Information found  
5 that Andy Rubin ...

6 [The history of sexual harassment \*\*scandals\*\* in \*\*Silicon ...\*\*](#)

7  <https://www.businessinsider.com/sexual-harassment-scandals-tech-industry-2017-7?op=1>


8 Here is a rundown of the current sexual harassment **scandals** rocking **Silicon Valley**, along  
9 with the long history of how the tech industry got here. ... 07/16/how-**silicon-valley**-silences-  
10 sexual ...

11 [Silicon Valley Star Lands New Job a Month After Sex Scandal](#)

12  <https://www.wired.com/2013/02/keith-rabois-khosla-ventures/>


13 A little more than one month after a sexual harassment **scandal** threatened to sink a **Silicon**  
14 **Valley** superangel, Keith Rabois has landed a new gig that puts him not too far from his old one..  
15 A ...

16 [Silicon Valley's Not-So-Hidden Secret: Sex Parties](#)

17  [https://www.newser.com/story/253597/silicon-valleys-not-so-hidden-secret-sex-](https://www.newser.com/story/253597/silicon-valleys-not-so-hidden-secret-sex-parties.html)  
18 [parties.html](https://www.newser.com/story/253597/silicon-valleys-not-so-hidden-secret-sex-parties.html)

19 **Silicon Valley's Not-So-Hidden Secret: Sex Parties ...** "These **sex** parties happen so often  
20 among the premier V.C. and founder crowd that this isn't a **scandal** or even really a secret, I've been  
21 ...

22 [Scandal cost Silicon Valley Community Foundation \\$1.5 M](#)

23  [https://www.mercurynews.com/2020/01/17/silicon-valley-community-foundation-](https://www.mercurynews.com/2020/01/17/silicon-valley-community-foundation-reveals-price-of-ousting-toxic-leadership/)  
24 [reveals-price-of-ousting-toxic-leadership/](https://www.mercurynews.com/2020/01/17/silicon-valley-community-foundation-reveals-price-of-ousting-toxic-leadership/)

25 Jan 17, 2020The leaders ousted for fostering a toxic workplace at the **Silicon Valley**  
26 Community Foundation walked away with tens of thousands of dollars in severance pay, tax filings  
27 show, revealing the cost ...

28 [Sexual harassment in \*\*Silicon Valley\*\*: have we reached a ...](#)



<https://www.theguardian.com/technology/2017/jul/09/silicon-valley-sexual-harassment-women-speak-up>

Jul 9, 2017The last week has seen women in **Silicon Valley** share stories of sexual harassment, assault and discrimination, prompting a backlash and high-profile resignations.

[The big lesson \*\*Silicon Valley\*\* can learn from the Theranos ...](#)

<https://fortune.com/2018/03/15/elizabeth-holmes-theranos-fraud-secrecy/>

Theranos CEO Elizabeth Holmes and former president Ramesh "Sunny" Balwani were charged with an "elaborate, years-long fraud."

A viral thread has busted the MYTH about "*Famous Billionaires Starting Out "Poor"*". Jonas Grinevičius and Justinas Keturka have revealed that we all love stories about scrappy underdogs who overcome the odds and make it big through relentless hard work, unwavering grit, and sheer force of will. However, the stories about how some of the richest and most powerful people made their millions (and billions) are too romanticized and gloss over some very important details. That's the point that Aidan Smith made in a viral Twitter thread where he explained how Jeff Bezos and others had a huge leg-up when it came to helping lay the foundations of their business empires. Namely—having families with lots of money. Google used taxpayer funds to start its monopoly per <https://medium.com/insurge-intelligence/how-the-cia-made-google-e836451a959e> and <https://qz.com/1145669/googles-true-origin-partly-lies-in-cia-and-nsa-research-grants-for-mass-surveillance/> ***Not only does Google not pay tens of billions of dollars of its taxes to sponsor firemen and teachers but Google used public resources to start its company! Billions of dollars of citizen funds were used by Google to create it's evil empire. Google gets away with this crap because it bribes major U.S. politicians from California!***

Aidan told Bored Panda that the US isn't the only country where a lot of people believe myths about businessmen while the truth is a Google search away. "It's far from a U.S.-exclusive phenomenon, but in America, it's easier for most people to imagine becoming a billionaire themselves than it is to imagine an economic order in which a handful of people own half the world's wealth. Social mobility from working-class to middle-class is increasingly out of reach and

Pg 1088 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 the illusion that one can conceivably amass a net worth of over a billion dollars is a comforting  
2 fantasy for many people.”  
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**EXHIBIT 47 - The Indisputable Facts**

**... that the Silicon Valley Oligarchs And Their Politicians:**

1. Control business and politics like a crime Cartel
2. Are a white male fraternity who attack outsiders in organized manners
3. Come from dynastic families that systematically ran them through Stanford, Harvard and Yale sociopath-in-training men's clubs
4. Were socially trained and programmed to operate in a closed, tribal, exclusionary manner
5. Operated the "Angelgate" collusion scandal and most every other financial crime in America.
6. Operated the "Silicon Valley High Tech Employee Collusion" for which they were sued in a famous class-action case
7. Controlled the White House and traded most of the key staff with the Administration.
8. Have been sued, indicted and charged in divorce proceedings with an unusually massive amount of sex trafficking matters
9. Use the same 10 law-firms who have been charged with public policy manipulation
10. Control internet news, media and information
11. "Own" certain U.S. Senators by virtue of direct bribe payments and securities/stock payola payments
12. Use a variety of tools like GUST, Private Google Docs sites, covert Facebook pages and similar, to secret conspire and plan collusion and organized monopolistic practices
13. Have their venture capitalists spy on entrepreneurs and copy their technology to be deployed by Google, or Facebook under a new name
14. Are a Mafia-like criminal organization.

Who are some of the biggest, elitist, self-aggrandizing, entitled, tone-deaf assholes in Silicon Valley?

The Tech Crunch Silicon Valley database-of-assholes provides that answer. They include: David Krane, Brian Bendett, Brendan Bulik-Sullivan, Terri Burns, Blake Byers, Tim Draper, Steve

1 Jurvetson, Elon Musk, Steve Westly, Steve Spinner, Tyson Clark, Frederique Dame, Tom Perkins,  
2 Scott Davis, Reid Hoffman, Eric Schmidt, Larry Page, Jared Cohen, David Drummond, Karim  
3 Faris, Tom Hulme, Joe Kraus, John Lyman, Vinod Khosla, Laura Melahn, Dave Munichiello, Erik  
4 Nordlander, Anthony Philippakis, Sridhar Ramaswamy, David Reshef, Ben Robbins, Issi Rozen,  
5 David Schenkein, Vidu Shanmugarajah, M.G. Siegler, Graham Spencer, Bethany Tsui, Jessica  
6 Verrilli, Andy Wheeler, Krishna Yeshwant, Asheem Chandna, Jerry Chen, Mike Duboe, Sarah Guo,  
7 Christine Kim, Josh McFarland, Saam Motamedi, Sridhar Ramaswamy, Corinne Riley, Jason Risch,  
8 Seth Rosenberg, David Sze, David Thacker, David Wadhwani, Manuel Bernal, Allie Dalglish, Don  
9 Sullivan, Yasmin Green, Kent Walker, Matt Rogers, Steven Chu, David Plouffe, Sergy Brin, Andy  
10 Rubin, Ian Fette, Travis Kalanick, Elizabeth Holmes, Dustin Moskovitz, Laurene Powell Jobs,  
11 Andy Bechtolsheim, Brian Goncher, Cheryl Sandberg, Gilman Louie, Ira Ehrenpreis, Tim Cook,  
12 James Breyer, Joe Lonsdale, Keith Rabois, Marc Andreessen, George Soros, Mario Rosatti, Martin  
13 LaGod, Michael Moritz, Viktor Vekselberg, Larry Summers, Pierre Omidyar, Tom Steyer,  
14 RoseAnn Rotando, Larry Birenbaum, Judy Estrin, Steven Goldby, Terry Kramer, Helen Raiser,  
15 John Scully, Sandi Thompson, Ann Wojcicki and their ilk...

16  
17 You can see that most of them have the same facial deformities that make them all look like yuppie  
18 frat or sorority clones with Moonie/Scientology dead eyes and fake smiles that broadcast their blind  
19 zealotry and sports bar fakery to the world. Every email, phone call, text, condo, office and brothel  
20 that these people use should be bugged by the FBI. These scammers built an insider-trading bubble  
21 of TED conferences and tech parties in which they mutually promote their Elizabeth Holmesian  
22 fantasies of holier-than-thou idiocracy. Emily Chang's book: "*Brotopia*" covers these scum-bags in  
23 great length.

24 As a Hoover Fellow puts it: "...Elite arrogant asshole dynasties send their kids to Stanford  
25 University. Stanford puts the kids in asshole frat houses to train them to get away with rape and run  
26 monopolies. When they graduate they either go up the hill to Sandhill Road and start a venture  
27 capital clone operation or they get their frat friends on Sandhill Road to racketeer-fund their start-  
28 up or political campaign using money scammed from your parents pension funds. They only work

1 *with their frat buddies and insiders in a tribal 'old boys club' manner. They steal all the technology*  
2 *and markets they want because they control all of the tech lawyers and politicians via bribes and*  
3 *revolving doors. Most of the money in Stanford University bank accounts is from Foreign and*  
4 *Hollywood oligarchs delivered as bribes meant to get their snot-nosed brats into Stanford. Stanford*  
5 *bosses keep all of this covered-up and covertly fund political campaigns to grease the wheels of*  
6 *political corruption. They then sexually extort some Stanford interns in Rosewood Hotel rooms, get*  
7 *the most 'trophy wife' ones pregnant, and start the cycle all over again. Alas, Stanford is the*  
8 *training ground for abuse, corruption and 'Bro-Crime'..."*

9       White House Staff including Rahm Emanuel, Bill Daley, Jay Carney, David Plouffe, Robert  
10 Gibbs, Steve Rattner, David Axelrod, John Podesta, et al; and The Secretary of Energy Steven Chu  
11 and the Chief Counsel for the United States Department of Energy Daniel Cohen and Bill Cooper  
12 were, (from 2007 forward), either financed by, friends, with, sleeping with, dating the staff of,  
13 holding stock market assets in, promised a revolving door job or government service contracts from,  
14 partying with, personal friends with, photographed at private events with, exchanging emails with,  
15 business associates of or directed by; our business adversaries, or the Senators and Department of  
16 Energy politicians that those business adversaries pay campaign finances to, or supply political  
17 digital search manipulation services to. Criminal U.S. Senators coordinated and profited in these  
18 schemes. Their own family members have now supplied evidence against them. Elon Musk and his  
19 frat boys display their self-aggrandizing vanity in sociopath glory because nobody tells them "no".  
20 Now we are calling them out!

21  
22 From 2007 forward, The White House and The U.S. Government were controlled by the Silicon  
23 Valley tech oligarchs for monopolistic profiteering! That is a violation of the law, the Constitution  
24 and the American Way. The named person's we have presented to the FBI, DOJ, SEC and other  
25 agencies, engaged in crimes to personally profit in the stock market and political venues. At the  
26 same time they operated the command and control of millions of dollars of defamation, character  
27 assassination and black-list attacks against us for reporting their crimes. These perpetrators are now  
28 being exposed, arrested, indicted and drained of their ill-gotten profits. We are owed our damages

1 compensation and we will not rest until we get it! Every member of the public is invited to help  
2 crowd-source the termination of these corrupt crooks.

3  
4 We worked for, with, in and around the White House and The Department of Energy. We were at  
5 the homes of the most famous people in government and their Silicon Valley financiers. We have  
6 cooperated with top law enforcement and Congressional investigators. Additional whistle-blowers  
7 have provided our effort with even more evidence. Ourselves, and investigating agencies, have  
8 absolute proof of the crimes, corruption and illicit activities and the ongoing cover-ups.

9 Agency staff were ordered to harm Applicants by manipulating their benefits in order to  
10 deny, delay, obfuscate and reduce their income as reprisal for their assistance to law enforcement in  
11 a political corruption and money laundering matter. Agency staff, ranging from the lowest level  
12 staff at the San Francisco, San Mateo, Los Angeles and Marin offices, and up to the director  
13 headquarters offices, participated in this reprisal-vendetta-revenge action to harm Applicants.  
14 Applicant's peers have filed DOJ and FBI criminal referrals, launched federal investigations and the  
15 assertions have been proven in numerous IG, FBI, Congressional and major news media  
16 investigations. Agency offices have failed to provide responsive FOIA requested data, hearing  
17 investigation data and fair responses because some of their staff are STILL operating a criminal  
18 cover-up which has now been update-reported to the FBI, Congress, the IG, the AG and  
19 investigative reporters.

20 Other federal agencies have complied, verified and provided the requested deliverables. SSA  
21 and GOVT have pointed the searchlight of suspicion on themselves, laser-like, by their overt failure  
22 to comply, unlike every other agency. Ironically, the political financing of their executives and their  
23 personal relationships "happens" to be with the exact same Silicon Valley oligarchs under felony  
24 criminal investigations. The stock market brokerage records, family trust accounts, PAC trace-  
25 routing, Interpol records and SEC investigation records proves it!

26 Unfortunately for the crooked agency staff, some Applicants have the authority, law  
27 enforcement credentials and training to arrest any person at their home or office and remand them to  
28 the FBI, DOJ or Sheriff. SSA and GOVT staff should not longer screw around! For example: Every

1 “unsigned” SSA email is tracked to the individual author by their IP address, device IMEI, web  
2 camera, building key card, door camera, parking lot use chart, building camera, vehicle tracking  
3 circuits, text dba records, keyboard UI/UX patterns, motherboard ID #, DNS routing, stingray read-  
4 outs and a vast number of other metrics. Applicant investigation peers know the exact person that  
5 wrote every SSA email or document or file request. There is no such thing as an anonymous SSA  
6 email. Transparency is the Applicants middle name. The FBI and CIA people that SSA and GOVT  
7 insiders think are their “buddies” may actually be **the APPLICANTS** buddies!

8       You will either give the Applicant his money and damages compensation, from his 2007  
9 benefits filings, forward, or suffer the consequences of the rapid acceleration of one of the largest  
10 investigations in modern history, supported by millions of voters with a shared peer-to-peer  
11 forensics social media network, the FBI and Congress. With the push of a single button, our latest  
12 info can be in the inbox of every blogger and independent investigative journalist in the world, in  
13 minutes.

14  
15 History has proven that non-corrupt portions of federal agencies and public service law and  
16 community action firms have executed on their willingness to expend millions of dollars of  
17 resources to fight this injustice. Every individual involved in this at SSA and GOVT are on a  
18 forensic database. No person at SSA or GOVT who uses our government as a ***garage sale for***  
19 ***corruption favors*** or a ***kill mill*** for political reprisals will avoid the 100% legally executed  
20 consequences. They will be targeted and prosecuted even more profoundly than the Applicants  
21 waere targeted with IC-type hit jobs.

22  
23 This felony criminal investigation case, is documented on thousands of websites and in dozens of  
24 federal court case records in which Applicant won the case or was vindicated in the case and in  
25 thousands of news websites. Applicants researchers and investigators disagree with any decision by  
26 any agency which causes a delay in response which puts the applicants in jeopardy for their life and  
27 safety. Testifying, and/or reporting about this crime has resulted in the death, potentially by murder,  
28 of the following individuals who reported to the authorities about this crime matter: *Rajeev*

1 Motwani; Gary D. Conley; Seth Rich; Philip Haney; David Bird; Doug Bourn; Misti Epstein;  
2 Joshua Brown; Kenneth Bellando; Moritz Erhardt; Imran Aliev; Kate Matrosova; David Drye;  
3 Vincent Foster; Kathy Ferguson; Duane Garrett; Eric S. Fox; Judi Gibbs; Berta Caceres; Suzanne  
4 Coleman; L.J. Davis; John Hillyer; Stanley Huggins; Sandy Hume; Shawn Lucas; Gary Johnson;  
5 John Jones; John F. Kennedy, Jr.; Stephen Ivens; Mary 'Caity' Mahoney; Eric Butera; Danny  
6 Casolara; John Ashe; Tony Moser; Larry Nichols; Joseph Rago; Ron Brown; Bob Simon; Don  
7 Adams; Peter Smith; Victor Thorn; Lori Klausutis; Gareth Williams; Daphne Caruana Galizia;  
8 James D Johnston; Dave Goldberg; Loretta Fuddy; Paul Wilcher; Gary Webb; Beranton J.  
9 Whisenant Jr; Stanley Meyer; Jon Parnell Walker; Tyler Drumheller; Barnaby Jack; Dominic Di-  
10 Natale; Barbara Wise; Ilya Zhitomirskiy; Jeff Joe Black; Robin Copeland; John Wheeler; Ashley  
11 Turton; Michael Hastings; Antonin Scalia; David Koschman; David Werner; Alex Okrent; Kam  
12 Kuwata; Larry Frankel; And hundreds more connected to this case who suddenly, and strangely,  
13 turned up dead in this case and, ironically, their deaths all benefit the suspects in this case.  
14 Applicants are also whistle-blowers who have been previously attacked in reprisal and who have  
15 been threatened with continued harm and death.

16 Because this case involves a huge number of deaths, spies, trillions of dollars of energy  
17 industry funds, hit-jobs and epic political dirty tricks contracts there is a warning in effect to every  
18 suspect on "**the list**". **"If any other principle whistle-blower in this case is killed, within 24 hours**  
19 **of their death, every person on "the list" will experience the worst possible outcome!"**

20 Any delay, obfuscation, cover-up, FOIA refusal or other obscuring tactic by each and every  
21 member of an agency employee or contracting entity will be prosecuted on a person-by-person  
22 basis. Each employee or official who causes, by their action, further harm to the Applicants will be  
23 sued personally, have their assets garnished and will have a formal criminal referral authored and  
24 submitted to the FBI, DOJ, FTC, Congress and the news media. Applicants have sued the highest  
25 level personnel in the government for corruption, launched FBI and Congressional investigations  
26 against them and had them removed from their jobs and placed under permanent surveillance. The  
27 court and news records prove this fact. Do not imagine that any reprisal action by a public agency  
28 staffer will go unnoticed or unpunished by federal law enforcement, public forensics and major



1 independent news media investigations.

2  
3 Pay the Applicants their damages compensation, whistle-blower fees, back-fees and offset monies  
4 **NOW!**

5 And 200+ other cases related to the same Cartel members including many lawsuits against  
6 Google for corruption, sex trafficking, racketeering and other forms of their usual crimes. Google's  
7 financier, political manipulation partner and spying command-and-control operative: In-Q-tel, was  
8 also sued for running dirty tricks campaigns against the Whistle-blowers. In-Q-Tel was forced to  
9 come to court in San Francisco and watch the Corbett Report's expose on them (   
10 <https://www.corbettreport.com/meet-in-q-tel-the-cias-venture-capital-firm-preview/> and  
11 <https://www.corbettreport.com/siliconvalley/> ) and then try to explain to the judge why they are a  
12 "non-profit charity" when they run dirty tricks campaigns for politicians and were caught with tons  
13 of cocaine on their airplanes.

## EXHIBIT 48 - KEY REPORTS

...ABOUT THE CORRUPTION CARTEL, BASED OUT OF SAN FRANCISCO CITY HALL, THAT STARTED ALL THIS, CAN BE FOUND AT:

[San Francisco Corruption Reports](#)

[Ongoing FBI Corruption Probe](#)

[San Francisco City Hall Corruption](#)

[FBI San Francisco Announces New Charges](#)

[CORRUPTION CENTRAL](#)

[SAN FRANCISCO CORRUPTION: City Hall, Pacific Heights And Silicon Valley Scum](#)

[https://en.wikipedia.org/wiki/San\\_Francisco\\_graft\\_trials](https://en.wikipedia.org/wiki/San_Francisco_graft_trials)

[https://www.searchingsanfrancisco.org/ - You Can't Swing A Cat In San Francisco City Hall](https://www.searchingsanfrancisco.org/-_You_Can't_Swing_A_Cat_In_San_Francisco_City_Hall)

[Without Hitting A Mobster](#)

[PUC boss Harlan Kelly \*\*arrested\*\* by Feds, charged in bribery ...](#)

[!\[\]\(f60b7a900783ac3fd531bfd9c111be6d\_img.jpg\) https://missionlocal.org/2020/11/puc-boss-harlan-kelly-arested-by-feds-charged-in-bribery-scheme/](https://missionlocal.org/2020/11/puc-boss-harlan-kelly-arested-by-feds-charged-in-bribery-scheme/)

PUC **boss** Harlan Kelly **arrested** by Feds, charged in bribery scheme, resigns ... the Zelig-like avatar of **San Francisco** institutional corruption, ... The stench of corruption at SF **City Hall** exceeds even the stench of human feces on **City** streets. Where was the District Attorney and **City** Attorney with their squads of highly paid staff while the ...

[SFPUC chief charged with accepting \*\*bribes\*\* in alleged \*\*City\*\* ...](#)

[!\[\]\(eabd9f9ababee93effadc3b380fe65fd\_img.jpg\) https://www.msn.com/en-us/news/crime/sfpuc-chief-charged-with-accepting-bribes-in-alleged-city-hall-corruption-scheme/ar-BB1bv5ri](https://www.msn.com/en-us/news/crime/sfpuc-chief-charged-with-accepting-bribes-in-alleged-city-hall-corruption-scheme/ar-BB1bv5ri)

1 Federal prosecutors have charged **San Francisco** Public Utilities Commission chief Harlan  
2 Kelly for allegedly accepting **bribes** from a contractor — taking international trips, free meals  
3 and ...

4 [Head of SFPUC charged in public corruption probe - San ...](#)

5  [https://www.bizjournals.com/sanfrancisco/news/2020/11/30/head-of-sfpuc-charged-in-](https://www.bizjournals.com/sanfrancisco/news/2020/11/30/head-of-sfpuc-charged-in-public-corruption-probe.html)  
6 [public-corruption-probe.html](https://www.bizjournals.com/sanfrancisco/news/2020/11/30/head-of-sfpuc-charged-in-public-corruption-probe.html)


7 Kelly, 58, was charged with one count of honest services wire fraud for allegedly engaging  
8 in a bribery scheme and corrupt partnership with Walter Wong, a **San Francisco** permit expeditor  
9 and ...

10 [San Francisco Recology Exec Accused of Paying Off DPW Head ...](#)

11  [https://www.nbcbayarea.com/news/local/san-francisco/san-francisco-recology-exec-](https://www.nbcbayarea.com/news/local/san-francisco/san-francisco-recology-exec-accused-of-paying-off-dpw-head-charged-with-bribery-money-laundering/2402801/)  
12 [accused-of-paying-off-dpw-head-charged-with-bribery-money-laundering/2402801/](https://www.nbcbayarea.com/news/local/san-francisco/san-francisco-recology-exec-accused-of-paying-off-dpw-head-charged-with-bribery-money-laundering/2402801/)


13 **San Francisco** Recology Exec Accused of Paying Off DPW Head Charged With Bribery,  
14 Money Laundering By Bay **City** News • Published November 18, 2020 • Updated on November 18,  
15 2020 at 9:45 pm Getty ...

16 [New charges in Nuru scandal accuse former Recology manager ...](#)

17  [https://sfbayca.com/2020/11/18/new-charges-in-nuru-scandal-accuse-former-recology-](https://sfbayca.com/2020/11/18/new-charges-in-nuru-scandal-accuse-former-recology-manager-of-bribery-money-laundering/)  
18 [manager-of-bribery-money-laundering/](https://sfbayca.com/2020/11/18/new-charges-in-nuru-scandal-accuse-former-recology-manager-of-bribery-money-laundering/)

19 Bovis was **arrested** back in January along with Nuru in connection with an unsuccessful  
20 scheme to **bribe** a **San Francisco** International Airport commissioner to aid Bovis in obtaining a  
21 restaurant concession in 2018. Bovis was charged with two counts of fraud, while Nuru was  
22 charged with fraud and lying to the FBI.

23 [San Francisco Official Charged With Corruption in FBI ...](#)

24  [https://www.nbcbayarea.com/news/local/san-francisco/san-francisco-public-works-](https://www.nbcbayarea.com/news/local/san-francisco/san-francisco-public-works-director-arrested-on-suspicion-of-public-corruption/2222125/)  
25 [director-arrested-on-suspicion-of-public-corruption/2222125/](https://www.nbcbayarea.com/news/local/san-francisco/san-francisco-public-works-director-arrested-on-suspicion-of-public-corruption/2222125/)


26 A top **San Francisco** public official and go-to bureaucrat to mayors over two decades was  
27 charged with public corruption Tuesday, upending **City Hall** as elected leaders scrambled to  
28 reassure the ...

**San Francisco Utilities Chief Faces Bribery Charge in ...**

 <https://www.courthousenews.com/san-francisco-utilities-chief-faces-bribery-charge-in-corruption-probe/>

"Bribery scams undermine our faith in **city** government," said David Anderson, U.S. Attorney for the Northern District of California, in a statement Monday. "Our investigation into **City Hall** corruption will continue." **San Francisco** Mayor London Breed announced that she has accepted Kelly's resignation.

**Recology exec accused of paying off SF DPW head charged ...**

 <https://www.ktvu.com/news/recology-exec-accused-of-paying-off-sf-dpw-head-charged-with-bribery-money-laundering>

A former manager for **San Francisco's** garbage collection agency Recology has been charged with bribery and money laundering in connection to the SF DPW corruption scandal.

**S.F. City Administrator Naomi Kelly takes leave of absence ...**

 <https://darkweb-sites.com/?p=68372>

**City** Administrator Naomi Kelly took a voluntary six-week leave of absence Wednesday, two days after federal prosecutors revealed a bribery case against her husband, former **San Francisco** Public Utilities Commission chief Harlan Kelly.. Naomi Kelly has not been charged with a crime. But the criminal complaint against her husband alleges she attended a 2016 family vacation that federal ...

**City Hall corruption case: What's next for S.F. City ...**

 <https://www.sfchronicle.com/crime/article/City-Hall-corruption-case-What-s-next-for-15767978.php>

**San Francisco City** Commissioner Naomi Kelly officiates the wedding of Heather Lee and Andrew Lindgren of **San Francisco** while on the Mayor's Balcony in **San Francisco City Hall** in **San Francisco** ...

The solipsistic self-aggrandizing corrupt pigs in San Francisco's City Hall and Pacific Heights are being hunted down (100% legally) and eviscerated by the FBI, public task forces like ours, the news media, private citizens and the biggest email leaks in history. Hundreds of people

1 will be taken down. The few arrests you have read about in the media are only the beginning. We are  
2 all starting at the bottom of the cesspool and working our way up, all the way through Elon Musk,  
3 Eric Schmidt, Larry Page, et al, and up to the White House. They will not escape, even in death.  
4 Roger Boas, Jeffrey Epstein, et al, may not still be lurking around but the truth about them will live  
5 on FOREVER!

6 The headline reads: "**House Lawmakers Introduce Antitrust Package to Limit Power of**  
7 **Tech Giants**"

8 ([https://www.ntd.com/house-lawmakers-introduce-antitrust-package-to-limit-power-of-tech-](https://www.ntd.com/house-lawmakers-introduce-antitrust-package-to-limit-power-of-tech-giants_626721.html)  
9 [giants\\_626721.html](https://www.ntd.com/house-lawmakers-introduce-antitrust-package-to-limit-power-of-tech-giants_626721.html))

10 This bipartisan initiative is being led by the House Judiciary Antitrust Subcommittee  
11 leadership, with each of the five bills having a Republican and Democratic co-sponsor. Each of the  
12 bills target different ways that tech companies **abuse their power, manipulate American politics**  
13 and **maliciously and mercilessly attack competitors** with help from California politicians who own  
14 parts of those tech companies. The witnesses in this case have been instrumental in driving these,  
15 and other tech anti-corruption efforts, to fruition. Those witnesses have sworn warranted and  
16 certified that the Defendants are a "*RICO Racketeering Organized Crime Cartel*", as defined by  
17 law, that is colluding for criminal purposes. This crime group is harming American citizens, the  
18 U.S. economy, and domestic Democracy. They use The U.S. Government and The Department of  
19 Transportation as a private slush-fund to pay off political financiers.

20 Ryan Cooper has noted that "...what America has today is almost exclusively the personal  
21 type of corruption, which is considerably worse than the other sort. (A patronage machine may be  
22 bent and inefficient, but at least a goodly share of the population gets a piece of the action, and  
23 often functional public works and services to boot.) For example, Rohit Chopra and Julie Margetta  
24 Morgan recently released a new report for the Roosevelt Institute looking not at money in politics,  
25 but money in government. They argue that existing anti-corruption laws are barely being enforced,  
26 and are outdated anyway... They also say the revolving door and cultural capture (i.e. the tendency  
27 of government employees to sympathize with supposed private-sector adversaries) has made  
28 regulators identify with the industries they oversee. Former Attorney General Eric Holder, for

1 instance, had an office reserved for him at the high-powered corporate law firm Covington &  
2 Burling for his whole tenure, to which he returned after repeatedly refusing to prosecute big banks  
3 or their employees for staggering crimes. (The really insidious thing is he would probably honestly  
4 deny his corporate ties influenced his decisions.) Finally, all this mess is largely out of public view  
5 and thus harder to understand or root out...It involves *de facto* bribery of government employees of  
6 both parties (in the form of future jobs, consulting gigs, speaking engagements, etc) by the  
7 wealthiest institutions in the land...”

8 The key Witnesses/Victims/Plaintiffs have demanded: 1.) damages payments; 2.) back-fee  
9 monies that are owed; 3.) release of benefits payments blockaded in reprisal; 4.) witness fees that  
10 are owed; 5.) whistle-blower fees that are owed; 6.) informant fees and 7.) related payments owed  
11 from the U.S. and California government and the operative Defendants.

12 The victims still have not received a dime of compensation while they suffered billions of  
13 dollars in government-sponsored damages. At the same time, the Defendants in this case made  
14 billions of dollars of government-sponsored profits at the expense of the victims.

15 The victims alliance has spent over a decade exposing the evidence in this book to every  
16 single voter in the nation. They have used direct mail, advertising, social media, torrents and other  
17 novel methods and technologies. Their goal is to end corruption in America by destroying all of the  
18 methods of corruption and each of the crooked main players using those methods. This book is  
19 being emailed to every person in America.

20 Many of the Witnesses/Victims/Plaintiffs were “*Democrats*” until they witnessed the heads  
21 of their party engage in bribery, fraud, corruption and other forms of some the most severe  
22 violations of the law, and the public trust, that one might ever imagine. In this case victims were  
23 having their own Senator competing against them and cutting off their government funds to help the  
24 victims competitors. Citizens suffered state-sponsored harm because their Senator owns stock in  
25 their competitors, ie: Google or Tesla, etc.

26 This matter involves each and every regulatory agency, services agency and law  
27 enforcement agency of the United States Government. It also involves the State Of California and  
28 the interaction between each and every one of the Cartel members.

1 The founders of Google, Facebook, Netflix, LinkedIn, Tesla, Sony Pictures, YouTube. Etc.  
 2 (the so called: "Tech Cartel"); knew Plaintiffs and went to school with Plaintiffs. They, and their  
 3 investors, asked to look at Plaintiffs patents, technologies and companies which Plaintiffs had  
 4 engineered and launched as businesses many years prior to when the Cartel copied those efforts.  
 5 Plaintiffs had patented and shown them to the Cartel bosses, under NDA, years before the "Tech  
 6 Cartel" bosses copied them and started their own versions of them. The emails, NDA's, patent office  
 7 files, court records, document leaks, Russian hacks and lawsuit records prove it. The Tech Cartel,  
 8 and their crooked politicians "spied and lied".

9 The Cartel chose to "*cheat rather than compete*". They spent over 16 billion dollars on  
 10 lobbyists at the United States Patent Office in order [to blockade the rights of small American](#)  
 11 [inventors like](#) Plaintiffs. They hired millions of dollars of Fusion  
 12 GPS-type/Gawker/Gizmodo/Google/YouTube media attackers to run hit-jobs on Plaintiffs, and  
 13 other entrepreneurs, because the Tech Cartel could not face the truth in a fair fight. Plaintiffs have  
 14 reported that they were in meetings with Defendants in which the Cartel planned, colluded and  
 15 designed efforts to manipulate the government, create monopolies and control and censor all media  
 16 access.

17 This is not a matter of "*crying over spilled milk*" because Plaintiffs were cut-out of  
 18 Defendants schemes. This is a matter of *Criminal Collusion!*

19 The Defendants companies and their founders ran ***an organized crime operation Cartel***.  
 20 That assertion is backed up in the books: "***Brotopia***" by Emily Chang; "***Whistleblower***" by Susan  
 21 Fowler, "***A Colossal Wreck***" By Alexander Cockburn, "***Emotional Intelligence***" By Daniel  
 22 Goleman, "***Drain The Swamp***" By Ken Buck, "***How Political Corruption Actually Works***" A  
 23 feature film by The Wiki Law-Pedia Group, "***Deleted***" By Allum Bokhari, "***The Creepy Line***" By  
 24 Matthew Taylor, "***Chaos Monkeys***" By Antonio Martinez, "***Disrupted***" By Dan Lyons, "***Catch and***  
 25 ***Kill***" By Ronan Farrow, "***Permanent Record***" By Edward Snowden, "***Throw Them All Out***" By  
 26 Peter Schweizer, "***The Circle***" By David Eggers, "***World Without Mind***" By Franklin Foer, "***A***  
 27 ***Journey into the Savage Heart of Silicon Valley***" By Corey Pein, and in ***hundreds*** of other books  
 28 and thousands of reports from the ***FBI, DOJ, FEC, SEC, FTC, EU, Inspector General's*** and other

1 government organizations globally. It is proven in the CBS news 60 Minutes episodes: "***The***  
2 ***Cleantech Crash***", "***Congress Trading On Insider Information***", "***The Lobbyists Playbook***" and  
3 other segments. It is proven in the feature documentary films including: "***Too Big To Fail***", "***Inside***  
4 ***Job***", "**How Political Corruption Works**", and "***Omerta - A Corruption Story***". The Cartel is deeply  
5 connected to the likes of Harvey Weinstein, Jeffrey Epstein and other notorious folks. The Cartel  
6 buys elections with impunity.

7 It is proven in hundreds of lawsuits, including Silicon Valley divorce court filings for abuse,  
8 available at [www.pacer.gov](http://www.pacer.gov) and it is now proven by the United States Government in the latest of a  
9 series of federal monopoly lawsuits. Per federal ***Case # 1:20-cv-03010***:

10 *"Today, millions of Americans rely on the Internet and online platforms for their daily lives.*  
11 *Competition in this industry is vitally important, which is why the challenge against Google — the*  
12 *gatekeeper of the Internet — for violating antitrust laws is a monumental case both for the*  
13 *Department of Justice and for the American people,"* said Attorney General William Barr. *"Since*  
14 *my confirmation, I have prioritized the Department's review of online market-leading platforms to*  
15 *ensure that our technology industries remain competitive. This lawsuit strikes at the heart of*  
16 *Google's grip over the internet for millions of American consumers, advertisers, small businesses*  
17 *and entrepreneurs beholden to an unlawful monopolist."*

18 *"As with its historic antitrust actions against AT&T in 1974 and Microsoft in 1998, the*  
19 *Department is again enforcing the Sherman Act to restore the role of competition and open the door*  
20 *to the next wave of innovation—this time in vital digital markets,"* said Deputy Attorney General  
21 Jeffrey A. Rosen.

22 As an example: As one of the wealthiest companies on the planet with a market value of \$1  
23 trillion, Google is the monopoly gatekeeper to the internet for billions of users and countless  
24 advertisers worldwide. For years, Google has accounted for almost 90 percent of all search queries  
25 in the United States and has used anti-competitive tactics to maintain and extend its monopolies in  
26 search and search advertising. Stanford University trained these people to be the worst version of  
27 criminal frat boys the world could have imagined. Now America must make things right again.

28 Hiring your own family in order to keep dark money secrets in Washington has gotten



1 "nuts". Walt Shaub, the former director of the United States Office of Government Ethics, called the  
2 situation "positively ridiculous" in a statement to the News.

3 "Haven't we had enough of nepotists in presidential administrations?" Shaub said. "It may be  
4 legal if Ricchetti wasn't directly involved in the hiring, but this is no way to send a message that  
5 ethics matters to the administration. It feels like the taxpayers are funding a career-building charity  
6 for the Ricchetti family. Add to that the fact that you've got Ricchetti's brother lobbying the  
7 administration, and this feels like a very special episode of the Partridge Family where they all pile  
8 in the van and go visit Washington — only they should call this show the Patronage Family."

9 As alleged in the Complaint, Google has entered into a series of exclusionary agreements  
10 that collectively lock up the primary avenues through which users access search engines, and thus  
11 the internet, by requiring that Google be set as the preset default general search engine on billions of  
12 mobile devices and computers worldwide and, in many cases, prohibiting preinstallation of a  
13 competitor.

14 Google owns, controls, pays and manipulates 70% of the members of Congress!

15 In particular, the Complaint alleges that Google has unlawfully maintained monopolies in  
16 search and search advertising by:

17 - Entering into exclusivity agreements that forbid preinstallation of any competing search  
18 service.

19 - Entering into tying and other arrangements that force preinstallation of its search  
20 applications in prime locations on mobile devices and make them undeletable, regardless of  
21 consumer preference.

22 - Entering into long-term agreements with Apple that require Google to be the default – and  
23 de facto exclusive – general search engine on Apple's popular Safari browser and other Apple  
24 search tools.

25 - Generally using monopoly profits to buy preferential treatment for its search engine on  
26 devices, web browsers, and other search access points, creating a continuous and self-reinforcing  
27 cycle of monopolization.

28 These and other anticompetitive practices harm competition and consumers, reducing the

1 ability of innovative new companies to develop, compete, and discipline Google's behavior.

2       The antitrust laws protect our free market economy and forbid monopolists from engaging in  
3 anticompetitive practices. They also empower the Department of Justice to bring cases like this one  
4 to remedy violations and restore competition, as it has done for over a century in notable cases  
5 involving monopolists over other critical industries undergirding the American economy like  
6 Standard Oil and the AT&T telephone monopoly. Decades ago the Department's case against  
7 Microsoft recognized that the antitrust laws forbid anticompetitive agreements by high-technology  
8 monopolists to require preinstalled default status, to shut off distribution channels to rivals, and to  
9 make software undeletable. The Complaints allege that Google is using similar agreements itself to  
10 maintain and extend its own dominance and to attack and destroy smaller companies and inventors.

11       The Complaints allege that Google's anticompetitive practices have had harmful effects on  
12 competition and consumers. Google has foreclosed any meaningful search competitor from gaining  
13 vital distribution and scale, eliminating competition for a majority of search queries in the United  
14 States. By restricting competition in search, Google's conduct has harmed consumers by reducing  
15 the quality of search (including on dimensions such as privacy, data protection, and use of consumer  
16 data), lessening choice in search, and impeding innovation. By suppressing competition in  
17 advertising, Google has the power to charge advertisers more than it could in a competitive market  
18 and to reduce the quality of the services it provides them. Through filing the lawsuit, the  
19 Department seeks to stop Google's anticompetitive conduct and restore competition for American  
20 consumers, advertisers, and all companies now reliant on the internet economy.

21       Those who cover-up for these crooks will experience a wrath like nothing they can imagine!  
22 The payback will come from the courts, the public, the news media, the history books and a new  
23 kind of automated AI software forensics that hunts and destroys the corrupt!

24       The witnesses and victims saw these crimes happen. FBI, GAO, SEC, FTC, DOJ, FCC, FEC  
25 and IG investigators have confirmed these assertions.

26       White House insiders have ordered this case covered-up and justice delayed.

27       The fact remains: **The Silicon Valley Oligarchs and their hired Senators are MOBSTERS!**  
28

1 This document is being provided in both hard-copy and digital PDF versions, concurrently,  
2 because the URL links in blue text, herein, provide crucial confirming evidence regarding our  
3 assertions. The online version of this document is updated weekly.

4 Additionally, the CBS News 60 Minutes broadcast news journal broadcasts titled: "**The**  
5 **Cleantech Crash**" and "**Congress Trading On Insider Information**" provide confirmations of the  
6 assertions. Additionally, the film: "**How Political Corruption Works**" at  
7 <http://www.majestic111.com> further details these assertions. Additionally the June 10, 2021 White  
8 House report on the urgent gaps in domestic electric car energy storage minerals further confirms  
9 our stated assertions of the dollar amounts being manipulated by corrupt politicians and oligarchs.  
10 Additionally, FBI, DOJ, FEC, EC, OSC, SEC and Congressional committee case files on this matter  
11 further confirm our assertions.

12 All evidence, below, has previously been supplied to SSA, FBI, OSC, OGIS, OGE and other  
13 jurisdictional agencies. Copies of the evidence are available, to view, again, online and in  
14 Victim/Witnesses's evidence binders, upon request.

15 One victim was an employee/contractor for the United States Government. Under California  
16 , [Assembly Bill 5](#) (AB-5), which is California Labor Code Section 2750.3 , Victim/Witnesses has  
17 all of the rights of a government employee, irrespective of contractor status. Victim/Witnesses's  
18 work as a U.S. Forest Service fire mitigation specialist; their rights as an heir under their father, a  
19 U.S. military and U.S. Forest Service long-term employee; Victim/Witnesses's work for The  
20 National Park Service on public use programs; Victim/Witnesses's credentialed under-cover work  
21 for various law enforcement and IC programs; Victim/Witnesses's work for the United States  
22 Department Of Energy under contract; Victim/Witnesses's work with Argonne, Sandia, Lawrence  
23 Livermore national laboratories per the executed non-disclosure and secrecy documents signed with  
24 each; Employment law firms have confirmed that, under current laws and legal precedents,  
25 Victim/Witnesses would be considered BOTH a previous government employee and government  
26 contractor; Millions of pages of supporting evidence relative to these assertions have provided to  
27 the government on hard drives, in on-line digital evidence repositories, Congressional Committee  
28 reports and in hundreds of published and broadcast news stories. This, and additional evidence,

1 proves that Victim/Witnesses deserves all of the rights, benefits, whistle-blower protections and  
2 earnings of a both a government employee and contractor but the govenment is blocking those  
3 rights in reprisal for reporting this corruption crime.

4 One Victim/Witnesses was exposed to toxic poisoning in their work in the national program  
5 laboratories per: Victim/Witnesses's work for the United States Department Of Energy under  
6 federal contract awarded in the Congressional Iraq War Bill; Victim/Witnesses's contract with  
7 Sandia National Laboratories under federal contract and NDA; Victim/Witnesses's U.S.  
8 Government certified issued and federally verified U.S. patent'and other IP per their work with the  
9 U.S. Department of Energy, The White House and The Environmental Protection Agency and  
10 related agencies document that Victim/Witnesses was exposed to deadly and dangerous chemicals  
11 and energy projectors alongside radioactive weapons-grade materials and that an adversary could  
12 have forced high dose exposure in a situation like the notorious Salisbury or Litvenenko reprisal  
13 poisonings; Victim/Witnesses's patents were drafted, researched and verified by major law firms  
14 who had engineers on staff that were able to later research and verify the chemical MSDS dangers (   
15 [https://en.wikipedia.org/wiki/Safety\\_data\\_sheet](https://en.wikipedia.org/wiki/Safety_data_sheet) ) of the chemicals listed in those patents, which  
16 only The U.S. Government had full knowledge of the dangers of and which Victim/Witnesses was  
17 not properly advised of or HazMat protected by during their work; Victim/Witnesses has been  
18 admitted to the emergency room on multiple occasions for toxic exposure to strange materials;  
19 Millions of pages of supporting evidence relative to these assertions have provided to the  
20 government on hard drives, in on-line digital evidence repositories, Congressional Committee  
21 reports and in hundreds of published and broadcast news stories;  
22 <https://en.wikipedia.org/wiki/Poisoning>; [https://en.wikipedia.org/wiki/Metal\\_poisoning](https://en.wikipedia.org/wiki/Metal_poisoning);  
23 <https://en.wikipedia.org/wiki/Toxicity>;  
24 [https://en.wikipedia.org/wiki/Electromagnetic\\_radiation\\_and\\_health](https://en.wikipedia.org/wiki/Electromagnetic_radiation_and_health);  
25 [https://en.wikipedia.org/wiki/Biological\\_effects\\_of\\_high-energy\\_visible\\_light](https://en.wikipedia.org/wiki/Biological_effects_of_high-energy_visible_light);  
26 [https://en.wikipedia.org/wiki/Karen\\_Silkwood](https://en.wikipedia.org/wiki/Karen_Silkwood);  
27 [https://en.wikipedia.org/wiki/Nuclear\\_and\\_radiation\\_accidents\\_and\\_incidents](https://en.wikipedia.org/wiki/Nuclear_and_radiation_accidents_and_incidents);  
28 [https://en.wikipedia.org/wiki/Lithium\\_Toxicity](https://en.wikipedia.org/wiki/Lithium_Toxicity); [https://en.wikipedia.org/wiki/Thallium\\_poisoning](https://en.wikipedia.org/wiki/Thallium_poisoning);

1 [https://en.wikipedia.org/wiki/Nuclear\\_labor\\_issues](https://en.wikipedia.org/wiki/Nuclear_labor_issues);

2 [https://en.wikipedia.org/wiki/Energy\\_Employees\\_Occupational\\_Illness\\_Compensation\\_Program](https://en.wikipedia.org/wiki/Energy_Employees_Occupational_Illness_Compensation_Program);

3 <https://www.cancerbenefits.com/cancer-benefit-programs/dept-of-energy-workers/>

4 This, and additional evidence, proves that Victim/Witnesses suffered toxic exposure through  
5 their work, or that victim's were reprisal-targeted for "[political poisoning](#)" which qualifies them for  
6 full SSDI benefits and that those SSDI benefits should be backdated to 2008. Victim's SSA benefits  
7 were ordered blocked in 2008, as reprisal for helping expose corruption and safety issues at the U.S.  
8 Department of Energy.

9 As part of this matter, one victim was employed for an average 60 hours per week, mostly in  
10 government and community agency work, from 1970 to 2008. The victim has provided over 1000  
11 pages of documents, verification letters, videos and other material on a website created for SSA to  
12 prove these assertions. Convicted Congressman Jesse Jackson Jr. (D-IL) is scheduled to receive  
13 \$8,700 per month in government disability pay, as well as a partial federal pension of \$45,000. That  
14 generous \$8,700 in disability comes thanks to Jackson's sudden development of a "mood disorder"  
15 as the federal government began looking to indict him. Jackson, who was sentenced to 2.5 years in  
16 prison, had no history of mental illness during his prior 17 years in Congress. So a criminal gets  
17 \$150K per year in the USA for disability and the victim only gets \$10K per year because the victim  
18 helped expose criminals like that one. SSA consultants have stated that they never heard of an  
19 Victim/Witnesses who had such a vast proven work record that then received such low monthly  
20 checks from SSA unless Victim/Witnesses's files and decisions had been manipulated by  
21 government officials operating a reprisal. Millions of pages of supporting evidence relative to these  
22 assertions have provided to the government on hard drives, in on-line digital evidence repositories,  
23 Congressional Committee reports and in hundreds of published and broadcast news stories.  
24 Victim/Witnesses wrote SSA and IRS together to ask them to research why there were blank years  
25 in SSA earnings records. Little or no help has been provided by SSA on this research. This, and  
26 additional evidence, proves that Victim/Witnesses/Victim is receiving an intentionally lower  
27 monthly benefit payment, than he earned, compared to the mean average of all other U.S. natural  
28 born citizens. Victim/Witnesses charges that benefits have been down-reduced in reprisal for

1 whistle-blowing and law enforcement assistance in a federal corruption investigation.


2 Over 80 individuals, who victims worked with, or knew, or who reported about the same  
3 crime that the victims reported, then died under suspicious circumstances. This validates the  
4 previous warnings of threatened reprisal harms against the victims. See Evidence Death List  
5 Document # 2021-DL3. Testifying, and/or reporting about this crime has resulted in the death,  
6 potentially by murder, of the following individuals who reported to the authorities about this crime  
7 matter: *Rajeev Motwani; Gary D. Conley; Seth Rich; Philip Haney; David Bird; Doug Bourn; Misti*  
8 *Epstein; Joshua Brown; Kenneth Bellando; Moritz Erhardt; Imran Aliev; Kate Matrosova; David*  
9 *Drye; Vincent Foster; Kathy Ferguson; Duane Garrett; Eric S. Fox; Judi Gibbs; Berta Caceres;*  
10 *Suzanne Coleman; L.J. Davis; John Hillyer; Stanley Huggins; Sandy Hume; Shawn Lucas; Gary*  
11 *Johnson; John Jones; John F. Kennedy, Jr.; Stephen Ivens; Mary 'Caity' Mahoney; Eric Butera;*  
12 *Danny Casolara; John Ashe; Tony Moser; Larry Nichols; Joseph Rago; Ron Brown; Bob Simon;*  
13 *Don Adams; Peter Smith; Victor Thorn; Lori Klausutis; Gareth Williams; Daphne Caruana*  
14 *Galizia; James D Johnston; Dave Goldberg; Loretta Fuddy; Paul Wilcher; Gary Webb; Beranton*  
15 *J. Whisenant Jr; Stanley Meyer; Jon Parnell Walker; Tyler Drumheller; Barnaby Jack; Dominic*  
16 *Di-Natale; Barbara Wise; Ilya Zhitomirskiy; Jeff Joe Black; Robin Copeland; John Wheeler;*  
17 *Ashley Turton; Michael Hastings; Antonin Scalia; David Koschman; David Werner; Alex Okrent;*  
18 *Kam Kuwata; Larry Frankel;* And hundreds more connected to this case who suddenly, and  
19 strangely, turned up dead in this case and, ironically, their deaths all benefit the suspects in this  
20 case. Victim/Witnesses are also whistle-blowers who have been previously attacked in reprisal and  
21 who have been threatened with continued harm and death. Millions of pages of supporting evidence  
22 relative to these assertions have provided to government offices on hard drives, in on-line digital  
23 evidence repositories, Congressional Committee reports and in hundreds of published and broadcast  
24 news stories. This, and additional evidence, proves the damages caused to victims by receiving  
25 ongoing death threats which are disabling and nerve-wracking.

26 Numerous federal investigators, Bob Simon of CBS News 60 Minutes, Sharyl Attkisson of  
27 CBS News, White House Chief of Staff Rahm Emmanuls staffer, Jofi Joseph and other insiders  
28 have confirmed that senior political officials ordered a “hit-job” on the victims in reprisal for

reporting financial crimes involving The U.S. Department of Energy and The White House. The attackers ordered victims “...cut off from every source of income...” as payback reprisal for their effective help in a massive anti-corruption effort by Congress and law enforcement concerns. The blockading of victims income and benefits was a key part of this vendetta effort., per: Agency Abuse and IRS Lois Lerner Lawsuit report # 2014-hg53; See Sharyl Attkisson’s books including “**Stonewalled**”; See Federal anti-corruption lawsuit which Victim/Witnesses and their peers won, proving crony reprisal manipulation of Victim/Witnessess government funds; The family of a U.S. Senator has stayed at the Victim/Witnesses’s home and Victim/Witnesses has had a long personal history with that family. Members of that family disclosed some of this information; Victim/Witnesses had a personal relationship with two of the best friends of the Secretary of State. One of those parties disclosed some of this information; Millions of pages of supporting evidence relative to these assertions have provided to the government on hard drives, in on-line digital evidence repositories, Congressional Committee reports and in hundreds of published and broadcast news stories.

This case involves “**trillions of dollars of stock market, financial and monopoly crimes**” by others. It is common knowledge that adversaries kill others in order to control trillions of dollars of anything. The USGS says the rare earth and energy mineral market is worth “trillions of dollars” which is also verified by hundreds of federal reports, CIA reports and news articles such as:

- **Trillion Motherlode of Lithium and Gold Discovered in ...**

 <https://www.mining.com/1-trillion-motherlode-of-lithium-and-gold-discovered-in-afghanistan/>

A recently unearthed 2007 United States Geological Service survey appears to have discovered nearly \$1 **trillion in** mineral deposits in **Afghanistan**, far [...] \$1 **Trillion Motherlode of Lithium** and ...

**B. Rare Earth: Afghanistan Sits on \$1 Trillion in Minerals**

<https://www.nbcnews.com/science/science-news/rare-earth-afghanistan-sits-1-trillion-minerals-n196861>

**Afghanistan** may be sitting on one of the richest troves of minerals in the world, valued at

1 nearly \$1 **trillion**, scientists say. ... zinc, mercury and **lithium**. ... while the Afghan government's ...

2 **C. Vast \$Trillion Mineral Deposits Discovered in Afghanistan ...**

3 [thenewslink.com/afghanistan-lithium-trillion-dollar-mineral-deposits](https://thenewslink.com/afghanistan-lithium-trillion-dollar-mineral-deposits)

4 'Trillion dollar' mineral deposits have been discovered in **Afghanistan** according to US  
5 officials. These deposits include vast quantities of iron, copper, and **lithium** (important to battery  
6 technologies).

7 **D. 1 trillion dollars of lithium in afghanistan**

8 <https://www.slideshare.net/hxmhxm/1-trillion-dollars-of-lithium-in-afghanistan>

9 **1 trillion dollars of lithium in afghanistan** 1. U.S. Identifies Vast Mineral Riches  
10 in **Afghanistan** Tyler Hicks/The New York TimesA bleak Ghazni Province seems to offer little, but  
11 a Pentagon study says it may have among the world's largest deposits **oflithium**.By JAMES  
12 RISENPublished: June 13, 201WASHINGTON — The United States has discovered nearly  
13 \$1 **trillion in** untapped mineraldeposits in ...



**EXHIBIT 49 – Turning Government Employees And Contractors Into Mobsters**

It is easy to understand that a business that generates trillions of dollars of profits would have a large organized crime operation involved in it that had members who were Senators and public agency officials who would go to great lengths, including felony crimes, to protect their endless supply of private jets, private islands and sex workers from these profits.

The U.S. Department Of Defense states that over 2300 United States citizens were killed in the fight for control of mineral and energy rights in Afghanistan. A large number of the deaths on Evidence Death List Document # 2021-DL3 were whistle-blowers in energy industry corruption relating to the “rare earth and energy mineral market”. The related facts prove that some people regularly kill other people, or harm them, in order to control this multi-trillion dollar energy market. Victim/Witnesses’s patents, technologies and work with The U.S. Government had a direct and overt ability to effect this market. Victim/Witnesses has proven there was 1.) the will, 2.) the motivation, 3.) the exclusive state-sponsored means, and 4.) a vast record of the suspects conducting the same exact attacks on Victim/Witnesses’s peers.

Over 20 Congressional hearings verify the evidence. 5 different federal lawsuits and their court records verify the assertions. The FBI, Police offices and security experts affirm that the evidence provided. On two different occasions, Victim/Witnesses’s car was rammed by a third party who then took off. Victim/Witnesses has received multiple phone, email and drive by death threats. Over 20 different attacks have been undertaken against Victim/Witnesses as documented in Demand Document # 2021-DMDn45

In this SSA case, Victim/Witnesses’s civil rights, human rights, legal rights, U.S. Constitutional rights and California Constitutional rights have been blockaded and violated. Additionally, SSA has prevented Victim/Witnesses from hiring a lawyer by minimizing their payments to such a barely survivable level that they can’t afford proper legal or CPA support.

This, and additional evidence, further proves that major public figures had the means and

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1 intent to manipulate, and DID manipulate Victim/Witnesses's government money and benefits. The  
2 massive scope and dollar amount of the organized crime validates the scale or illegality and the  
3 depth of tactics which the suspects are known to stoop to in order to harm those in their way. The  
4 massive scope and dollar amount of the organized crime validates the scale or illegality and the  
5 depth of tactics which the suspects are known to stoop to in order to harm those in their way.

6 According to Victim/Witnesses's DOJ, FBI and CIA contacts: The U.S. Government , in  
7 particular the DOJ, have filed charges against over 100 individuals who hacked into The U.S.  
8 Government 's highest level servers, including the GOVT, DOJ and SSA servers on which  
9 Victim/Witnesses's records are kept. Individuals including: Wang Dong, Sun Kailiang, Wen Xinyu,  
10 Huang Zhenyu, and Gu Chunhui, who were officers in Unit 61398 of the Third Department of the  
11 Chinese People's Liberation Army (PLA) and Anatoliy Sergeyevich Kovalev, Aleksei Sergeyevich  
12 Morenets, 41, Evgenii Mikhaylovich, Serebriakov, 37, Ivan Sergeyevich Yermakov, 32, Artem  
13 Andreyevich Malyshev, 30, and Dmitriy Sergeyevich Badin, 27, who were each assigned to  
14 Military Unit 26165, and Oleg Mikhaylovich Sotnikov, 46, and Alexey Valerevich Minin, 46, who  
15 were also GRU officers, and hackers-for-hire including Kevin David Mitnick, Adrian Lamo, Albert  
16 Gonzalez, Matthew Bevan, Richard Pryce, Jeanson James Ancheta, Michael Calce, Kevin Poulsen,  
17 Jonathan James, The hacker known as ASTRA, The hacker known as GUCIFER, The hacker  
18 known as ANON 4CHAN, The for-hire hacking service known as "Hafnium" and THOUSANDS  
19 of other individuals had free access and free reign throughout NSA, FBI, SSA, DOJ, OPM, CIA and  
20 other government servers via the SPECTRE, EMOTET, PRIME ROOTKIT, SERCOMM  
21 BACKDOOR, NOTPETYA, MELTDOWN, MASTERKEY, RYZENFALL, FALLOUT,  
22 CHIMERA, and hundreds of other back doors and penetration vulnerabilities in Cisco, Intel,  
23 Juniper Networks, AMD, and other equipment.

24 Additionally, all of the core server penetration tools used by the CIA and the NSA were  
25 hacked by foreign nations and their core source code posted on the internet for all to use. It is well  
26 documented that most agency government servers, prior to 2020, were widely penetrated and  
27 manipulated. The hackers are all known to have sold, or provided the results of their work to  
28 famous politicians for use against their competitors. Nancy Pelosi is an owner of the hacking

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1 manipulation firm: CROWDSTRIKE. Crowdstrike and famous California Senators had the easy  
2 means, the motivations, the staffing, the resources and the known engagement of services to  
3 manipulate SSA, DOJ, SEC, FTC and other agency decisions and filing records in order to harm  
4 Victim/Witnesses, reporters and whistle-blowers who reported their crimes and corruptions.

5 Each and every law firm capable of handling Victim/Witnesses case has been contracted,  
6 paid and/or influenced so that they are “conflicted out” from representing Victim/Witnesses. Law  
7 firm Mofo was threatened if they helped Victim/Witnesses. Lawyer Amy Anderson was threatened  
8 and lost her license for attempting to help Victim/Witnesses. Every lawyer or law firm who  
9 attempts to help Victim/Witnesses is hired by Defendants, or their agents and threatened or  
10 compromised in order to prevent them from helping Victim/Witnesses because this case affects  
11 trillions of dollars of energy industry profits, the White House, billionaire oligarchs and multi  
12 millionaire corrupt Senators. In fact, this issue lies at the root of this entire corruption case.  
13 Sociopath over-moneyed Silicon Valley oligarchs have hire Morrison Foerster, Wilson Sonsini,  
14 Perkins Coie, Covington Burling and every other major law firm and lobbyist and told them to “kill  
15 everyone and destroy everything that I don’t like...”. These law firms (controlled by Mark  
16 Zuckerberg, Elon Musk, Larry Page, Eric Schmidt, Steve Westly, Vinod Khosla, Laurene Powell  
17 Jobs, Nancy Pelosi, etc. All of whom have nearly a trillion dollars of funds at their disposal) have  
18 carte blanche and unlimited payments to run coups, character assassination campaigns, money  
19 laundering and other crimes for the oligarchs. They have the staffing to do these things and zero  
20 incentive to not do crimes. These law firms are the dirty deeds teams for the mobster-like suspects  
21 and there is no law enforcement body with the will nor resources to stop them. It is a violation of  
22 the U.S. Constitution to tell Victim/Witnesses to “go get a law firm” when EVERY possible,  
23 equitable, law firm works for, and is massively compensated by, the criminals that need to be sued.  
24 Both the politicians AND the tech oligarchs charged with these crimes have hired the very law  
25 firms that government agencies have told Victim/Witnesses to go out and hire.

26 There is a precedent that was set in the US Supreme Court case: Gideon v. Wainwright,  
27 (1963) that clarifies that you have a right to a lawyer even if you don't have money for one. The  
28 Sixth Amendment, as applied to the states through the Fourteenth Amendment Due Process Clause

1 gives one their Due Process rights. One needs to kill someone, though, to most easily get your free  
2 lawyer, since the court-appointed lawyer is rarely ever appointed, on citizens behalf, in a case like  
3 this. Even if a defendant is represented by an attorney of his or her choosing, he or she may be  
4 entitled to relief on appeal if the attorney did not provide adequate representation. A defendant must  
5 demonstrate that the attorney's performance "fell below an objective standard of reasonableness"  
6 and that this was prejudicial to the case. See:

7 [Strickland v. Washington](#)

8 ( <https://supreme.justia.com/cases/federal/us/466/668/case.html> )

9 , 466 U.S. 668, 688-92 (1984). A few "free lawyers", that victims had tried, turned out to be  
10 working for the opposition side.

11 The federal organization: <https://www.lsc.gov> is required to help but has refused because it's  
12 administrators were friends with, and appointed by, the public officials charged with corruption in  
13 this case. Victim/Witnesses have personally asked the Attorney General, The Director of the FBI  
14 and the U.S. Attorney's office for representation but they have been told not to respond because the  
15 case is politically embarrassing to major public officials and their corrupt Silicon Valley financiers.  
16 Victim/Witnesses contacted David L. Anderson, U.S. Attorney for the Northern District of  
17 California, and his senior staff, via certified letter and requested that they assist with the case but  
18 senior DOJ officials in Washington, DC refused to respond to the Northern District.

19 The government agencies who have told Victim/Witnesses that Victim/Witnesses should  
20 "hire a law firm and sue them", in order to resolve this matter, are the same government agencies  
21 that have cut-off, or blockaded Victim/Witnesses income sources in order to prevent  
22 Victim/Witnesses from being able to afford to hire a law firm to sue them.

23 SSA provided Victim/Witnesses with a list of "free lawyers". Upon FBI-level investigation  
24 of every "free lawyer" on the list, (via their financial contributions, voting records, leaked emails,  
25 social media postings, event attendance, public records, social connections lists online and other  
26 surveillance data) they all worked for, or with the opposition interests and could not have possibly  
27 provided unbiased services. In fact, multiple lawyers have contacted Victim/Witnesses who turned  
28 out to be working for the opposition. They were sent in to delay, or redirect, Victim/Witnesses in

1 order to keep the cases from being filed or properly prosecuted in order to protect the suspects. This  
2 is a common infiltration procedure widely documented in CIA, British secret service, Russian FSB  
3 and Snowden leaks documents on IC dirty tricks tactics.

4 Agency staff were ordered to harm Victim/Witnessess by manipulating their benefits in  
5 order to deny, delay, obfuscate and reduce their income as reprisal for their assistance to law  
6 enforcement in a political corruption and money laundering matter. Agency staff, ranging from the  
7 lowest level staff and up to the director headquarters offices, participated in this reprisal-vendetta-  
8 revenge action to harm Victim/Witnessess.

9 Victim/Witnesses's peers have filed DOJ and FBI criminal referrals, launched federal  
10 investigations and the assertions have been proven in numerous IG, FBI, Congressional and major  
11 news media investigations. Agency offices have failed to provide responsive FOIA requested data,  
12 hearing investigation data and fair responses because some of their staff are STILL operating a  
13 criminal cover-up which has now been update-reported to the FBI, Congress, the IG, the AG and  
14 investigative reporters.

15 Other federal agencies have complied, verified and provided the requested deliverables. SSA  
16 and GOVT have pointed the searchlight of suspicion on themselves, laser-like, by their overt failure  
17 to comply, unlike every other agency. Ironically, the political financing of their executives and their  
18 personal relationships "happens" to be with the exact same Silicon Valley oligarchs under felony  
19 criminal investigations. The stock market brokerage records, family trust accounts, PAC trace-  
20 routing, Interpol records and SEC investigation records proves it!

21 Precedents, and the law, provide that, under the circumstances, the government must provide  
22 a law firm and CPA service to Victim/Witnesses, at no charge to Victim/Witnesses, to mediate a  
23 resolution to these issues. SSA must take an effective hand in coordinating these services to be  
24 provided to Victim/Witnesses.

25 This, and additional evidence, proves that Victim/Witnesses's rights to equitable legal  
26 representation, as required by law, have been denied and blockaded  
27  
28

**EXHIBIT 50 - The Details Of The RICO Racketeering Complaint And Reprisal Complaints**

Everything in this book has also been filed as an inspector general complaint, an FBI criminal referral, an FTC demand for anti-trust charges against the defendants and a general law enforcement advisory on behalf of the public

The key witness, known as "WITNESS-2021B, Plaintiffs"

The UNITED STATES GOVERNMENT has been asked to join this case as Co-Plaintiffs

The DEFENDANTS are named and you can web search each of their names and find some pretty shocking news articles about their notorious manipulations of public policy and their nefarious actions in the corruption of the government.

FBI-grade investigation files have been created on each of the perpetrators. Those files are updated, for the rest of their lives, as new evidence is accrued.

**ERIC SCHMIDT**

539 S. Mapleton Dr

Holmby Hills, California 90024

**STEVEN CHU**

-

**NATIONAL VENTURE CAPITAL ASSOCIATION**

-

**JOSEPH BIDEN in his official capacity as**

President of the United States,  
1600 Pennsylvania Avenue NW  
Washington, DC 20500

**EXECUTIVE OFFICE OF THE PRESIDENT**

1600 Pennsylvania Avenue NW  
Washington, DC 20500,

**THE WHITE HOUSE OFFICE**

1600 Pennsylvania Avenue NW  
Washington, DC 20500

**OFFICE OF THE VICE PRESIDENT**

1600 Pennsylvania Avenue NW

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Washington, DC 20500

**JEN PSAKI**

in her official capacity as Press Secretary  
to the President of the United States,  
1600 Pennsylvania Avenue NW  
Washington, D.C. 20500;

**THE CLINTON FOUNDATION** a/k/a Bill, Hillary & Chelsea Clinton Foundation 1200 President

Clinton Avenue

Little Rock, Arkansas 72201

Via: Corporation Service Company

1090 Vermont Ave., N.W.

Washington, D.C. 20005

**THE CLINTON GLOBAL INITIATIVE**

1200 President Clinton Avenue

Little Rock, Arkansas 72201

Via: John Tisdale (Registered Agent)

200 West Capitol, Suite 2300

Little Rock, Arkansas 72201

&

1271 6th Avenue

New York, NY 10020

**THE CLINTON GUISTRA PARTNERSHIP**

c/o Frank Giustra

1502 San Ysidro Drive

Beverly Hills, California 90210

**MEDIA MATTERS FOR AMERICA**

455 Massachusetts Avenue, N.W.

Suite 600

Washington, D.C. 20001

Via: DAVID BROCK

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1 455 Massachusetts Avenue, N.W.

2 Suite 600

3 Washington, D.C. 20001

4 CORRECT THE RECORD

5 455 Massachusetts Avenue, N.W.

6 Suite 660

7 Washington, D.C. 20001

8 THE NICK DENTON TABLOID EMPIRE

9 -

10 AMERICAN BRIDGE 21st CENTURY

11 455 Massachusetts Avenue, N.W.

12 Suite 600

13 Washington, D.C. 20001

14 -

15 CITIZENS FOR RESPONSIBILITY AND ETHICS IN WASHINGTON (CREW)

16 455 Massachusetts Avenue, N.W.

17 6th Floor

18 Washington, D.C. 20001

19 -

20 SHAREBLUE

21 c/o David Brock

22 2130 Cathedral Avenue, N.W.

23 Washington, D.C. 20008

24 &

25 Corporation Trust Company

26 Registered Agent for True Blue Media, LLC

27 Corporation Trust Center

28 1209 Orange Street



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1 **Wilmington, Delaware 19801**

2 **DAVID BROCK**

3 **2130 Cathedral Avenue, N.W.**

4 **Washington, D.C. 20008**

6 **WILLIAM JEFFERSON CLINTON**

7 **15 Old House Lane**

8 **Chappaqua, New York 10514**

9 **HILLARY RODHAM CLINTON**

10 **15 Old House Lane**

11 **Chappaqua, New York 10514**

12 **&**

13 **3067 Whitehaven Street, N.W.**

14 **Washington, D.C. 20008**

15 **GEORGE SOROS**

16 **178 Cantitoe Street**

17 **Katonah, NY 10536**

18 **JOHN PODESTA**

19 **3743 Brandywine Street, N.W.**

20 **Washington, D.C. 20016**

21 **JONATHAN WACKROW**

22 **44 Stavola Road**

23 **Middletown, New Jersey 07748**

24 **CARDINAL & PINE**

25 **-**

26 **PACRONYM**

27 **-**

**ACRONYM**

-

**THE AMERICANO**

-

**INVESTING IN US**

-

**SHADOW INC**

-

**COURIER NEWSROOM**

-

**IN-Q-TEL**

-

**GAWKER MEDIA**

-

**JALOPNIK**

-

**GIZMODO MEDIA**

-

**K2 INTELLIGENCE**

-

**WIKISTRAT**

-

**PODESTA GROUP**

-

**FUSION GPS**

-

**GOOGLE**

-

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1	<u>YOUTUBE</u>
2	-
3	<u>ALPHABET</u>
4	-
5	<u>FACEBOOK</u>
6	-
7	<u>TWITTER</u>
8	-
9	<u>THINK PROGRESS CONSULTING</u>
10	-
11	<u>MEDIA MATTERS</u>
12	-
13	<u>BLACK CUBE</u>
14	-
15	<u>ORBIS BUSINESS INTELLIGENCE</u>
16	-
17	<u>UNDERCOVER GLOBAL LTD</u>
18	-
19	<u>JIGSAW</u>
20	-
21	<u>SHAREBLUE/ACRONYM OFFICES</u>
22	-
23	<u>VERSA LLC</u>
24	-
25	<u>AMERICAN LEDGER</u>
26	-
27	<u>SUPERMAJORITY NEWS</u>
28	-

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1	<u>NEW VENTURE FUND</u>
2	-
3	<u>SIXTEEN THIRTY FUND</u>
4	-
5	<u>SID BLUMENTHAL</u>
6	-
7	<u>STATES NEWSROOM</u>
8	-
9	<u>HOPEWELL FUND</u>
10	-
11	<u>AMPLIFIRE NEWS</u>
12	-
13	<u>AMERICAN BRIDGE GROUP</u>
14	-
15	<u>PLOUFFE CONSULTING</u>
16	-
17	<u>PANTSUIT NATION</u>
18	-
19	<u>MOTIVEAI</u>
20	-
21	<u>AMERICAN BRIDGE 21ST CENTURY FOUNDATION FUND</u>
22	-
23	<u>PRIORITIES USA</u>
24	-
25	<u>SUNSHINE SACHS</u>
26	-
27	<u>THE AMERICAN INDEPENDENT FOUNDATION</u>
28	-

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1	<u>COVINGTON AND BURLING</u>
2	-
3	<u>BUZZFEED</u>
4	-
5	<u>THE AMERICAN INDEPENDENT</u>
6	-
7	<u>PERKINS COIE</u>
8	-
9	<u>SECONDARY INFEKTION</u>
10	-
11	<u>WILSON SONSINI</u>
12	-
13	<u>GOOGLE/ALPHABET/YOUTUBE FUND</u>
14	-
15	<u>THE NATIONAL VENTURE CAPITAL ASSOCIATION LOBBY GROUP</u>
16	-
17	<u>SPACE X</u>
18	-
19	<u>LACHLAN SEWARD</u>
20	-
21	<u>RAHM EMANUAL</u>
22	-
23	<u>ROBERT GIBBS</u>
24	-
25	<u>DAVID AXELROD</u>
26	-
27	<u>BARACK OBAMA</u>
28	-

Pg 1124 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1	<u>LARRY SUMMERS</u>
2	-
3	<u>BILL DALEY</u>
4	-
5	<u>STEVE RATTNER</u>
6	-
7	<u>ERIC HOLDER</u>
8	-
9	<u>LARRY PAGE</u>
10	-
11	<u>JOHN Doerr</u>
12	-
13	<u>STEVE WESTLY</u>
14	-
15	<u>RICHARD BLUM</u>
16	-
17	<u>RAY LANE</u>
18	-
19	<u>ELON MUSK</u>
20	-
21	<u>ANDY BECHTOLSHEIM</u>
22	-
23	<u>VINOD KHOSLA</u>
24	-
25	<u>MARTIN LAGOD</u>
26	-
27	<u>LATHAM AND WATKINS</u>
28	-

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1	<u>IRA EHRENPREIS</u>
2	-
3	<u>ERIC STRICKLAND</u>
4	-
5	<u>IN-Q-TEL, INC.</u>
6	-
7	<u>TIM DRAPER</u>
8	-
9	<u>LLOYD CRAIG BLANKFEIN</u>
10	-
11	<u>RAJ GUPTA</u>
12	-
13	<u>BRIAN GONCHER</u>
14	-
15	<u>JOHN MOLINARI</u>
16	-
17	<u>GOLDMAN SACHS</u>
18	-
19	<u>KLEINER PERKINS</u>
20	-
21	<u>DRAPER FISHER</u>
22	-
23	<u>MCKINSEY CONSULTING</u>
24	-
25	<u>JOHN DENNISTON</u>
26	-
27	<u>DIANNE FEINSTEIN</u>
28	-

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1	<u>HARRY REID</u>
2	-
3	<u>LELAND YEE</u>
4	-
5	<u>LOIS LERNER</u>
6	-
7	<u>JAMES BROWN JR</u>
8	-
9	<u>DANIEL COHEN</u>
10	-
11	<u>JONATHAN SILVER</u>
12	-
13	<u>BILL LOCKYER</u>
14	-
15	<u>STEVE JURVETSON</u>
16	-
17	
18	<u>KATHY ZOI</u>
19	-
20	
21	<u>CAROL BATTERSHAL</u>
22	-
23	<u>MATT ROGERS</u>
24	-
25	<u>STEVE SPINNER</u>
26	-
27	<u>ALISON SPINNER</u>
28	-



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1	<u>GAWKER MEDIA</u>
2	-
3	<u>JEZEBEL MEDIA</u>
4	-
5	<u>GIZMODO MEDIA</u>
6	-
7	<u>JALOPNIK</u>
8	-
9	<u>JAY CARNEY</u>
10	-
11	<u>DAVID PLOUFFE</u>
12	-
13	
14	<u>JOHN COOK</u>
15	-
16	
17	<u>NICHOLAS GUIDO DENTON</u>
18	-
19	<u>JOHN HERRMAN</u>
20	-
21	
22	<u>ADRIAN COVERT</u>
23	-
24	<u>PATRICK GEORGE</u>
25	-
26	
27	<u>GABRIELLE DARBYSHIRE</u>
28	-

A.J. DELAURIO, AS WELL AS THROUGH ITS PSEUDONYMOUS AUTHORS, INCLUDING:

ADAM DACHIS, ADAM WEINSTEIN, ADRIEN CHEN, ALAN HENRY, ALBERT BURNEKO, ALEX BALK,

ALEXANDER PAREENE, ALEXANDRA PHILIPPIDES, ALLISON WENTZ, ANDREW COLLINS,

ANDREW MAGARY, ANDREW ORIN, ANGELICA ALZONA, ANNA MERLAN, ARIANA COHEN,

ASHLEY FEINBERG, AVA GYURINA, BARRY PETCHESKY, BRENDAN I. KOERNER, BRENDAN

O'CONNOR, BRENT ROSE, BRIAN HICKEY, CAMILA CABRER, CHOIRE SICHA, CHRIS MOHNEY,

CLOVER HOPE, DANIEL MORGAN, DAVID MATTHEWS, DIANA MOSKOVITZ, ELEANOR SHECHET,

ELIZABETH SPIERS, ELIZABETH STARKEY, EMILY GOULD, EMILY HERZIG, EMMA

CARMICHAEL, ERIN RYAN, ETHAN SOMMER, EYAL EBEL, GABRIELLE, BLUESTONE, GABRIELLE

DARBYSHIRE, GEORGINA K. FAIRCLOTH, GREGORY HOWARD, HAMILTON, NOLAN, HANNAH

KEYSER, HUDSON HONGO. HEATHER DEITRICH, HUGO SCHWYZER, HUNTER SLATON, IAN

FETTE, IRIN CARMON, JAMES J. COOKE, JAMES KING, JENNIFER OUELLETTE, JESSE OXFELD,

JESSICA COHEN, JESUS DIAZ, JILLIAN SCHULZ, JOANNA ROTHKOPF, JORDAN SARGENT, JOSEPH

KEENAN TROTTER, JOSH STEIN, JULIA ALLISON, JULIANNE E. SHEPHERD, JUSTIN HYDE, KATE

DRIES, KATHARINE TRENDACOSTA, KATHERINE DRUMMOND, KELLY STOUT, KERRIE UTHOFF,

KEVIN DRAPER, LACEY DONOHUE, LUCY HALLER, LUKE MALONE, MADELEINE DAVIES,

MADELINE DAVIS, MARIO AGUILAR, MATT HARDIGREE, MATT NOVAK, MICHAEL BALLABAN,

MICHAEL DOBBS, MICHAEL SPINELLI, NEAL UNGERLEIDER, NICHOLAS ASTER, OMAR

KARDOUDI, PIERRE OMIDYAR, OWEN THOMAS, PATRICK GEORGE, PATRICK LAFFOON,

PATRICK REDFORD, RICH JUZWIAK, RICHARD BLAKELY, RICHARD RUSHFIELD, ROBERT

FINGER, ROBERT SOROKANICH, RORY WALTZER, ROSA GOLIJAN, RYAN BROWN, RYAN

GOLDBERG, SAM FAULKNER BIDDLE, SAM WOOLLEY, SAMAR KALAF, SARAH RAMEY, SHANNON

MARIE DONNELLY, SHEP MCALLISTER, SOPHIE KLEEMAN, STEPHEN TOTILO, TAMAR WINBERG,

TARYN SCHWEITZER, TAYLORMCKKNIGHT, THORIN KLOSOWSKI, TIM MARCHMAN, TIMOTHY

BURKE, TOBEY GRUMET SEGAL, TOM LEY, TOM SCOCCA, VERONICA DE SOUZA, WES SILER,

WILLIAM HAISLEY, WILLIAM TURTON AND OTHERS WRITING UNDER PSEUDONYMS

**AND NUMEROUS UNKNOWN GOVT'S 1-100 INCLUDING UNITED STATES  
GOVERNMENT AND CALIFORNIA STATE GOVERNMENT ELECTED, APPOINTED  
AND HIRED PUBLIC OFFICIALS**

Those are some of the key "bad guys" in the corruption matter. Jury trials have been demanded but the Defendants have spent millions of dollars to blockade any jury trial from every happening because they know that their Cartel will be exposed in any such trial.

**EXHIBIT 51 - We're Not Saying It's Mobsters But...It's Mobsters**

Per the Office of the Clerk of this honorable Court, in order to assist the Court after being assured that a RICO Case Statement is never *prohibited*, this Complaint (and analogous follow-on Complaints) will be proceeded by such a Case Statement.

As will be referenced below, allegations contained within this RICO Case Statement, RICO Complaint and Anti-Trust filing are based upon eye-witness information, FBI reports, FTC reports, GAO reports, Congressional Ethics Reports, SEC reports, FEC reports, good faith information and belief.

Social Security Administration records and servers were hacked and manipulated. Data and decision materials harmful to lead Plaintiffs were manipulated and political reprisal actions were undertaken by Social Security officials in order to punish lead Plaintiffs for his whistle-blower and law enforcement actions in a substantial organized crime case.

Victim/Witnesses' were induced to invest millions of dollars, and all of their life savings, in a government run project. It was later discovered that ***every government operator of that project was either financed by, friends, with, sleeping with, dating the staff of, holding stock market assets in, promised a revolving door job or government service contracts from, partying with, personal friends with, photographed at private events with, exchanging emails with, business associates of or directed by; the Victim/Witnesses' business adversaries, or the politicians that those business adversaries pay campaign finances to, or supply political digital search manipulation services to. They all used the same couple of law-firms, investment bankers, CPA's, lobbyists and policy manipulation operatives. There can be no question about the fact that the government officials involved "colluded", "conspired" and "coordinated" for their own, personal, unjust gain and quid pro quo. Crooked government employees and contractors made billions of dollars in unjust gains while Victim/Witnesses' lost billions of dollars BECAUSE crooked government employees and contractors engaged in these crimes, defrauded Victim/Witnesses' and used Victim/Witnesses' as a smoke-screen to cover-up their crimes. That***

1 *“project” turned out to be an operation of the Tech Cartel described in this document as an*  
2 *organized crime endeavor.*

3 *To be clear: EACH CITY, STATE, COUNTY AND FEDERAL OFFICIAL CHARGED*  
4 *IN THIS MATTER WAS RECEIVING STOCK MARKET ASSETS, DIRECT CASH*  
5 *PAYMENTS, POLITICAL CAREER EXCLUSIVES, SEX WORKER EXCHANGES, REAL*  
6 *ESTATE PERKS, PROMOTIONS AND OTHER BRIBES; AND THOSE OFFICIALS HAD*  
7 *INVESTMENT, PERSONAL AND POLITICAL AFFILIATIONS WITH THE ADVERSARIES*  
8 *CHARGED HEREIN; AND THOSE OFFICIALS HAVE BEEN FOUND, BY FEDERAL*  
9 *INVESTIGATORS, TO HAVE USED SPY AGENCY RESOURCES TO ATTACK Plaintiffs IN*  
10 *REPRISAL AND IN ANTI-COMPETITIVE BUSINESS INTERFERENCE.*

11 Victim/Witnesses/Plaintiffs AKA “WITNESS-2021B” had a personal, professional, social,  
12 co-habitation and other relationships with White House, Congressional, City Hall and government  
13 agency staff from 1970 to this date. Alas, many of those figures have been found to have been  
14 owned and control by Victim/Witnesses/Plaintiffs arch competitors who also happen to be in  
15 violation of numerous felony laws. For example: The Silicon Valley Big Tech Cartel, which these  
16 RICO and anti-trust charges are focused on, are seeking to pull the plug on the effort to recall  
17 California Gov. [Gavin Newsom](#) because Newsom ges most of his money and marketing from them.  
18 Laurene Powell Jobs, the widow of Apple CEO Steve Jobs, donated \$200,000 to his political action  
19 committee, followed by a \$100,000 donation from former Google CEO Eric Schmidt on June 4,  
20 according to a [filing](#) with California's secretary of state.  
21 Reed Hastings, the founder and co-CEO of Netflix, [gave](#) \$3 million to save Newsom, making him  
22 the largest donor to any candidate in the likely gubernatorial recall.  
23 Paramount Pictures [donated](#) \$40,000, but the contribution was actually made by ViacomCBS, the  
24 studio's parent company, despite the record from the California secretary of state's office listing  
25 Paramount as the contributor, a Paramount spokesperson [said](#).  
26 Donations to a candidate for office would normally be subject to campaign finance laws, but  
27 Newsom's effort to prevail in a recall is considered a ballot initiative rather than a candidacy, lifting  
28 the cap.

1 Almost every party on the attached Defendants list has ownership in companies that compete with  
2 Victim/Witnesses/Plaintiffs forced out of business companies and federal patents, which  
3 Victim/Witnesses/Plaintiffs created years before any of the Defendants did.  
4 The facts are that almost every official in HUD, SSA, GOVT and related agencies have been  
5 exposed in their emails, financials, stock records and revolving door jobs to be competitors to  
6 Victim/Witnesses/Plaintiffs by providing funds to, or receiving assets from his competitors and by  
7 their foolish belief that one technology, or another, has a political party designation associated with  
8 it and a “good ole boys club” protecting it. Victim/Witnesses/Plaintiffs ran for the office of Mayor  
9 in 1987 at the suggestion of the Fair Political Practices and other law enforcement entities. That  
10 matter was a “sting operation” which resulted in the arrest and prosecution of other candidates for  
11 Mayor for embezzlement of City funds and the operation of a child prostitution ring.  
12 Victim/Witnesses/Plaintiffs have an “FBI-level” knowledge set of political corruption in the Bay  
13 Area and receives/provides information from/to federal law and intelligence investigators. For these  
14 types of services, SSA was compromised to be used as a reprisal weapon against  
15 Victim/Witnesses/Plaintiffs.

16 This matter involves Defendants, together known as the “Tech Cartel”, and their organized  
17 crime activities. These activities are operated by well-known public officials working with Silicon  
18 Valley tech oligarchs via surrogates at a specific set of colluding: 1.) tech law firms, 2.) CPA firms,  
19 3.) lobbyists, 4.) media hit-job services and 4.) tactical contracted-operatives.

20 For the past decade in which relevant predicate reprisal acts were corruptly carried out by  
21 the named defendants as “payback” for Plaintiffs role in the ***Solyndra; Energy Stock Bribes*** and  
22 ***Rare Earth Mining Corruption*** cases and his status as a “whistle-blower” to GAO, FBI, FTC,  
23 Congress and other entities (for his temerity in telling the truth concerning obstruction of justice and  
24 gross abuse of power), along with the corrupt politicians surrogates and collaborators (referenced  
25 individually and collectively as the “Tech Cartel”).

26 It is hereby demanded that the FBI interview and ascertain the attack contract compensation  
27 sources along with the command and control managers for attacker/Defendants: **GABRIELLE**  
28 **DARBYSHIRE, A.J. DELAURIO, DAVID PLOUFFE, PATRICK GEORGE, ADRIAN**

1 **COVERT, JOHN HERRMAN, NICHOLAS GUIDO DENTON, and JOHN COOK**, for their  
2 organized attacks on Plaintiffs. The FBI evidence from those interviews and investigations will  
3 confirm the assertions herein.

4 Defendants actions have been synonymous with criminal behavior, malicious baseless  
5 attacks (using mainly the illicit and vicious defamatory tactics against perceived political enemies  
6 (like the Plaintiffs here) of those willing to compensate participants like Brock, Plouffe, Carney,  
7 etc.) – and coordinating by mail and wire to violate myriad Federal and State laws in the  
8 exploitation of Tech Cartel nonprofit entities they use for purely partisan purposes.

9 This Tech Cartel has taken such attacks to an unprecedented and chilling new level  
10 involving illegal domestic human and electronic surveillance, and spy agency tradecraft such as  
11 “lures” run in order to obstruct other federal Investigations by compromised agencies of the  
12 government, all against private citizens in order to assist putting crony associates in political office,  
13 destroying whistle-blowers, and enriching themselves with monopolistic control of **internet, media,**  
14 **energy, vehicle** and **mining markets**. While the **Frank Giustra** mining deals and the **Uranium1**  
15 mining deals have been the subject of recent reports, the entirety of the rare earth mining corruption  
16 and payola, worth **trillions of dollars** in ill-gotten profits, has yet to be fully explored in the media.

17 **In one example:** according to investigations by the United States Congress, and as  
18 anticipated to emerge from numerous ongoing government investigations, politicians and Silicon  
19 Valley tech oligarchs and certain other Tech Cartel named and unknown named, and high-level  
20 surrogates, colluded with Russian intelligence (SVR and FSB) and a disgraced (and according to a  
21 referral from the United States Senate Committee on the Judiciary, a putative criminal) former  
22 British intelligence officer (Christopher Steele) to accomplish their illicit and unconstitutional  
23 objectives. These Tech Cartel defendants, surrogates and participants have their opportunity to  
24 properly respond before a court they knowingly misled many times using the most powerful  
25 counterintelligence tools available. Let them do so now.

26 Defendant Brock’s malfeasance became more precisely organized in the Tech Cartel, and  
27 thus fully weaponized, as he joined forces with former president William Jefferson Clinton, Hillary  
28 Rodham Clinton and funder George Soros (“Soros”), and at various stages of the illegal Tech

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1 Cartel, the other defendants named here. They, and the Tech Cartel they formed to control the  
2 Democratic Party, took illicit advantage of a previously inviolate structural arrangement (between  
3 all three branches of our government) codified in the Foreign Intelligence Surveillance Act  
4 (“FISA”) by arranging for payment through smear merchants Fusion GPS to the Russian SVR and  
5 FSB and British (former) agent Christopher Steele (“Steele”). To abolish their enemies, in other  
6 words, the Tech Cartel defendants were willing to defy all legal and constitutional dictates –  
7 including certain actors within the Obama Department of Justice ineffably misleading Article III  
8 colleagues resident in this very Court. This is sedition, bordering on treason, and patently illegal.

9 As will be discussed throughout this RICO matter, the Tech Cartel set up and used many  
10 unsecure private email servers to conceal from Congress and the Article III Courts tens of thousands  
11 of e-mails. These emails, many of which remain missing, obscured (and obscure) from all  
12 constitutional branches (thus obstructing justice in myriad ways), and, more broadly, from the  
13 people of the United States who are not judges or elected officials, Tech Cartel wrongdoing. Of  
14 those emails that have been recovered, they contain classified information that should never be on  
15 an unsecured server because that presents (for many reasons), a danger to the national security of  
16 the United States. Russian and Chinese state spy agencies are known to have acquired all such  
17 emails via hacking and back door 9-11 exploits. They have begun posting that data widely on the  
18 internet. The total email batches from John Doerr and Vinod Khosla, alone are shocking in, and of,  
19 themselves. Third party hackers have the entire drive sets from the Hunter Biden laptop and the  
20 Clinton home server.

21 As such, The Tech Cartel can and must be charged with using illicit espionage under the  
22 clear language of the relevant statute(s). Tech Cartel surrogate James Comey (then-FBI Director)  
23 and Loretta Lynch (then-Attorney General) did not so charge; instead, they devised a scheme to  
24 protect their Crony’s within the Tech Cartel – with the intent that such scheme would help ensure  
25 the election of their friends and with such victory would ensure the Tech Cartel would persevere  
26 into perpetuity and that they (and other Tech Cartel principals, surrogates and participants) would  
27 be richly rewarded. No one would have ever known except for certain FBI and Whistle House  
28 whistle-blowers.



1 At the time of this filing, numerous government investigations involving findings highly-  
2 similar to the factual allegations and claims underlying this Complaint are ongoing at the United  
3 States Department of Justice at the FBI, within the DoJ Inspector General's Office, and at least one  
4 United States Attorney's Office. The United States Congress is/are conducting several more, in both  
5 the House and the Senate, and despite holdover Tech Cartel obstruction appears within its  
6 committee oversight function to be making substantial progress regarding the very issues raised  
7 here. The evidence produced by those investigations will spurn follow-on investigations and/or  
8 prosecutions with respect to the Tech Cartel defendants and their surrogates and other participants  
9 as described herein. Corroborated and/or new evidence from these (and possibly other)  
10 investigations, as they mature, can and must be incorporated into this lawsuit at the appropriate time  
11 to reinforce its verisimilitude.

12 Another major investigation (among several) of this seditious abuse by the Tech Cartel and  
13 individuals named herein has been undertaken by the Department of Justice Inspector General,  
14 providing yet another avenue to satisfy the standard of plausible evidence for this lawsuit,  
15 comcomitant with a parallel investigation relating to this and related illegalities by Tech Cartel  
16 participants – undertaken at the instructions of the United States Attorney General and conducted by  
17 the United States Attorney for the District of Utah as a predicate for the putative referral to a duly  
18 constituted grand jury and the appointment of a(nother) Special Counsel. Also pending is the  
19 appointment and findings of a Special Counsel to investigate and prosecute FISA abuse and Media  
20 Matters/Shareblue illicit partnership with Facebook to “weaponize” private information in violation  
21 of U.S. law. Bill Gates, Elon Musk, Bill Clinton, The heads of MIT and other notables, have all  
22 been connected with the Epstein sex cult. The actual connection between all of those players is as  
23 much political as it is sexual. Their meetings were Tech Cartel organized crime collusion planning  
24 sessions and many of those meetings were recorded. Bill Gates divorce, Jeffrey Epstein's death and  
25 Elon Musk's flight to Texas are all because of these leaks.

26 In another example, Plaintiffs informed FBI Director and James Comey and United States  
27 Attorney General Eric Holder, in time-stamped writing, of the following facts. Plaintiffs are now  
28 informed that those parties ran cover-ups of these facts and charges in order to protect the Tech

1 Cartel:

2 Compensation is thereby demanded from The U.S. Government and the California State  
3 Government, by Victim/Witnesses', for damages, monies owed, witness fees, legal expenses,  
4 whistle-blower fees, informant fees and with-held benefits monies. Additionally, Victim/Witnesses'  
5 submitted invoices to FBI, GAO, SEC, and other agencies that Victim/Witnesses' have provided  
6 witness and investigation services to.

7 This case involves the illicit sale and trading of stocks, bonds, mutual funds, and other  
8 securities; quid pro quo political bribery; election manipulation; monopoly and anti-trust law  
9 violation; bodily harm and other criminal matters applicable to every law enforcement and  
10 regulatory agency.

11 This corruption involves the following:

- 12 • where a financial or other advantage was offered, given or promised to another person with  
13 the intention to induce or reward them or another person to perform their responsibilities or duties  
14 improperly (it does not have to be the person to whom the bribe is offered that acts improperly); or  
15 • where a financial or other advantage was requested, agreed to be received or accepted by  
16 another person with the intention of inducing or rewarding them or another person to perform their  
17 responsibilities or duties inappropriately (it does not have to be the person who receives the bribe  
18 that acts improperly).

19 The bribes included:

- 20 • assets given or received directly or through a third party (such as someone acting on the  
21 government's behalf, for example an agent, distributor, supplier, joint venture partner or other  
22 intermediary); or  
23 • assets and stocks for the benefit of the recipient or some other person.

24 The bribes took many forms, for example:

- 25 • money (or cash equivalent such as shares);  
26 • unreasonable gifts, entertainment or hospitality;  
27 • kickbacks;  
28 • prostitutes;

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- attacks on, and murders of, witnesses;
- unwarranted rebates or excessive commissions (e.g. to sales agents or marketing agents);
- unwarranted allowances or expenses;
- “facilitation” payments/payments made to perform their normal job more quickly and/or prioritise a particular constituent;
- political/charitable contributions;
- uncompensated use of company services or facilities; or
- anything else of value.

This corruption goes between both the public and private sectors.

No agency may refuse, or seek to re-direct, this case, to another agency, because this case falls within the purview of every law enforcement and regulatory agency in the USA. This case also falls within the purview of multi-national enforcement under Interpol, FinCEN, EU, etc. To reiterate: this is not a single-agency matter. No agency has the right to seek to shove this case off to another agency or cover-up this matter at the expense of citizen Constitutional and human rights.

This case involves different organizations who are in contest to control the United States government and the financial and power benefits therefrom.

This case involves the control of the White House and the existence, or termination, of the power in the Oval Office and international corrupt mining deals worth trillions of dollars.

Victim/Witnesses’ witnessed an organized criminal Tech Cartel which affected government Treasury funds. The crime scheme involved: stock market manipulation, corrupt international mining deals and media company power manipulations. When Victim/Witnesses’ reported the crime, millions of dollars of state-sponsored reprisal attacks ( enumerated in detail below) were launched against Victim/Witnesses’ in vendetta.

Related cases shed illuminate the depths of criminality and the scope of crimes and illicit deeds by the colluding perpetrators and their crime culture:

In federal **Case No. 1:20-cv-03010** – you see proof that perpetrator Google is monopoly and runs competitor attacks. In **Case No. 11-CV-2509** -<https://www.cand.uscourts.gov/judges/koh-lucy-h-lhk/in-re-high-tech-employee-antitrust-litigation/> - you see proof that the Silicon Valley Cartel

colludes to harm others. In Task Force Case **No. 20-xyz2020a** - <http://www.majestic111.com> - you see proof that this “Silicon Valley Cartel” is a RICO law violating entity. In **Case No. 20-03664** - <https://www.insurancejournal.com/app/uploads/2020/06/brown-v-google.pdf> – you see further evidence that the Google-Youtube-Alphabet organization operates as a racketeering entity that controls portions of the government.

In Case No. **1:12-CV-00774-mms** and related cases - <https://thehill.com/blogs/congress-blog/the-administration/250109-a-case-study-in-pay-to-play-cronyism> – You see that criminal referrals against the attackers have been filed with the FBI, DOJ, SEC, FEC, FTC and that insider cronyism at The U.S. Government is accelerating at a rapid pace up and including the recent Granholm investigations.

Additional court cases, available on [www.pacer.gov](http://www.pacer.gov), have filed extensive further evidence proving Victim/Witnesses' assertions. Such key cases include:

**Case No. 18-cv-8865** (S.D.N.Y.)(SEC v. Elon Musk for lies and scams )

**Case No. 18-cv-8947** (S.D.N.Y.)( SEC v. Tesla, Inc. for lies and scams )

**Case No. 1:14-cv-270143** ( Google racketeering charges - <https://artistrightswatch.com/2017/10/08/googles-racketeering-challenge/> )

**Case No. 1:19-cr-00490** ( United States v. Epstein - Big tech sex cult crimes case )

**Case No. 129 So.3d 1196** (Fla. 2d DCA 2014); 170 So.3d 125 (Fla. 2d DCA 2015)  
( Gawker Media, LLC v. Bollea in which Gawker, Deadspin, Gizmodo, Jalopnik, Jezebel, Kotaku and Lifehacker were exposed as character assassination and money-laundering fronts working for notorious third parties)

**Case No. 19-cv-343672** James Martin (on behalf of ALPHABET INC) v Larry Page et al  
(Sex Cults In Silicon Valley )

**Case No. CGC-11-508414**, California Superior Court, San Francisco (Victim/Witnesses' v Google )

**Case No. 3:16-cv-03061** U.S. DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA, San Francisco Division ( Victim/Witnesses' V. Google/Alphabet/YouTube)

**Case No. 18-CIV05380** Rubin Vs. Rubin (Google sex cult and sex slave charges )

1 **Case No. : 1:17 - cv - 06404** Vs. Rubin (Organized crime sex trafficking by stock market  
2 manipulators )

3 **Case No. D.C. No. 3:17-cv-05369** - VC (Big tech harassment of outsiders)

4 **Case No. 3:21-cv-00077** (Another of many lawsuits proving that the Silicon Valley Cartel  
5 conspires to manipulate media and markets)

- 6 1. Victim/Witnesses' were induced to invest millions of dollars, and all of their life savings, in  
7 a government run project. It was later discovered that ***every government operator of that***  
8 ***project was either financed by, friends, with, sleeping with, dating the staff of, holding***  
9 ***stock market assets in, promised a revolving door job or government service contracts***  
10 ***from, partying with, personal friends with, photographed at private events with,***  
11 ***exchanging emails with, business associates of or directed by; the Victim/Witnesses'***  
12 ***business adversaries, or the politicians that those business adversaries pay campaign***  
13 ***finances to, or supply political digital search manipulation services to. They all used the***  
14 ***same couple of law-firms, investment bankers, CPA's, lobbyists and policy manipulation***  
15 ***operatives. There can be no question about the fact that the government officials involved***  
16 ***"colluded", "conspired" and "coordinated" for their own, personal, unjust gain and quid***  
17 ***pro quo. Crooked government employees and contractors made billions of dollars in***  
18 ***unjust gains while Victim/Witnesses' lost billions of dollars BECAUSE crooked***  
19 ***government employees and contractors engaged in these crimes, defrauded***  
20 ***Victim/Witnesses' and used Victim/Witnesses' as a smoke-screen to cover-up their crimes.***  
21 ***That "project" turned out to be an operation of the Tech Cartel described in this***  
22 ***document as an organized crime endeavor.***

23  
24  
25 This is a felony-grade criminal racketeering case. White House, Department of Energy,  
26 Department of State and other California State and Federal government agency staff coordinated  
27 with their political campaign financier/beneficiaries from Solyndra, Tesla, Fisker, Facebook,  
28 Google, YouTube, Netflix, Linkedin, Alphabet, Kleiner Perkins, Greylock, Goldman Sachs and

1 other PAC-aligned Silicon Valley businesses to operate a RICO-law and Antitrust-law violating  
2 illicit business “Cartel”. The operation of this Cartel has been proven by leaked emails, whistle-  
3 blowers, lawsuits and FBI-type forensic accounting.

4 ***The statute of limitations*** has not been exceeded in this case because the attacks, harms and  
5 perpetrators actions have continued as recently as yesterday.

6 This illicit organization had planned to skim trillions of dollars of exclusive profits from  
7 government contracts, political payola, foreign rare earth mining operations, internet news and  
8 search manipulation deals, revolving-door deals and massive computerized algorithm-based stock  
9 market manipulations. The Defendants schemes, particularly, planned to exploit funds from the  
10 2008 and 2021 “Stimulus Bills”. Victim/Witnesses"s', government employee/contractors, competed  
11 with these entities, with superior technology at lower prices, and were targeted by this Cartel, for  
12 termination.

13 Victim/Witnesses"s' became information providers and whistle-blowers for investigators in  
14 the examination of this crime. Defendants expended vast amounts of corporate and taxpayer money  
15 and resources harming Victim/Witnesses's in reprisal vendetta attacks. Over a million pages of  
16 evidence and proof are provided on the case website. Damages and attacks on Victim/Witnesses'  
17 continue to today.

**EXHIBIT 52 - Blockade Of Plaintiffs Legal Representation And Rights**Victim/Witnesses' Demand State-Funded **Legal Representation**

**A.** Victim/Witnesses's have been “black-listed” from getting legal representation. Even though the law in California (Cal. Lab. Code § § 1050 to 1053) says that an entity *can't* prevent or attempt to prevent former workers from getting work or representation through misrepresentation, knowingly permitting or failing to take reasonable steps to prevent blacklisting, or make a statement about why an employee was discharged or left employment, implying something other than what is explicitly said, or providing information that was not requested: ***It is done every day in Silicon Valley.*** The “*Silicon Valley No Poaching Black-List*” class-action lawsuit, the “*AngelGate Scandal Investigation*” , and many other notorious scandals and books are about this issue. Federal FAR Section 9.104-1 (d), and related laws, apply. Blacklisting is a key part of the IC Vendetta Cycle attacks. The Victim/Witnesses' also suffered damage to their rights under the Age Discrimination in Employment Act (ADEA) (29 USC Sec. 621, et seq.); the Americans with Disabilities Act (42 USC Sec. 12181, et seq.); the Civil Rights Acts - (42 USC Sec. 2000, et seq.); the Davis-Bacon Act (40 USC Sec. 276a, et seq.); the Employee Retirement Income Security Act (ERISA) (29 USC Sec. 1001, et seq.); the Equal Pay Act (29 USC Sec. 206[d]) and other violations.

**B.** Each and every law firm capable of handling Victim/Witnesses's case has been contracted, paid and/or influenced so that they are “conflicted out” from representing Victim/Witnesses's. Law firm Mofo was threatened if they helped Victim/Witnesses's. Lawyer Amy Anderson was threatened and lost her license for attempting to help Victim/Witnesses's. Every lawyer or law firm who attempts to help Victim/Witnesses's is hired by Defendants, or their agents and threatened or compromised in order to prevent them from helping Victim/Witnesses's because this case affects trillions of dollars of energy industry profits, the White House, billionaire oligarchs and multi millionaire corrupt

1 Senators. In fact, this issue lies at the root of this entire corruption case. Sociopath over-moneyed  
2 Silicon Valley oligarchs have hire Morrison Foerster, Wilson Sonsini, Perkins Coie, Covington  
3 Burling and every other major law firm and lobbyist and told them to “*kill everyone and destroy*  
4 *everything that I don’t like...*”. These law firms (controlled by Mark Zuckerberg, Elon Musk, Larry  
5 Page, Eric Schmidt, Steve Westly, Vinod Khosla, Laurene Powell Jobs, Nancy Pelosi, etc. All of  
6 whom have nearly a trillion dollars of funds at their disposal) have carte blanche and unlimited  
7 payments to run coups, character assassination campaigns, money laundering and other crimes for  
8 the oligarchs. They have the staffing to do these things and zero incentive to not do crimes. These  
9 law firms are the dirty deeds teams for the mobster-like suspects and there is no law enforcement  
10 body with the will nor resources to stop them. It is a violation of the U.S. Constitution to tell  
11 Victim/Witnesses's to “go get a law firm” when EVERY possible, equitable, law firm works for,  
12 and is massively compensated by, the criminals that need to be sued. Both the politicians AND the  
13 tech oligarchs charged with these crimes have hired the very law firms that government agencies  
14 have told Victim/Witnesses's to go out and hire.

15  
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17  
18 **C.** There is a precedent that was set in the US Supreme Court case: Gideon v. Wainwright, (1963)  
19 that clarifies that you have a right to a lawyer even if you don't have money for one. The Sixth  
20 Amendment, as applied to the states through the Fourteenth Amendment Due Process Clause gives  
21 one their Due Process rights. One needs to kill someone, though, to most easily get your free  
22 lawyer, since the court-appointed lawyer is rarely ever appointed, on citizens behalf, in a case like  
23 this. Even if a defendant is represented by an attorney of his or her choosing, he or she may be  
24 entitled to relief on appeal if the attorney did not provide adequate representation. A defendant must  
25 demonstrate that the attorney’s performance “fell below an objective standard of reasonableness”  
26 and that this was prejudicial to the case. See:

27  
28 Strickland v. Washington ( <https://supreme.justia.com/cases/federal/us/466/668/case.html> ) , 466



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1 U.S. 668, 688-92 (1984). A few “free lawyers”, that Victim/Witnesses' had tried, turned out to be  
2 working for the opposition side.

3  
4 **D.** The federal organization: <https://www.lsc.gov> is required to help but has refused because it's  
5 administrators were friends with, and appointed by, the public officials charged with corruption in  
6 this case.

7  
8  
9 **E.** Victim/Witnesses's have personally asked the Attorney General, The Director of the FBI and the  
10 U.S. Attorney's office for representation but they have been told not to respond because the case is  
11 politically embarrassing to major public officials and their corrupt Silicon Valley financiers.

12  
13 **F.** The government agencies who have told Victim/Witnesses's that Victim/Witnesses's should  
14 “*hire a law firm and sue them*”, in order to resolve this matter, are the same government agencies  
15 that have cut-off, or blockaded Victim/Witnesses's income sources in order to prevent  
16 Victim/Witnesses's from being able to afford to hire a law firm to sue them.

17  
18  
19 **G.** A federal agency provided Victim/Witnesses's with a list of “free lawyers”. Upon FBI-level  
20 investigation of every “free lawyer” on the list, (via their financial contributions, voting records,  
21 leaked emails, social media postings, event attendance, public records, social connections lists  
22 online and other surveillance data) they all worked for, or with the opposition interests and could  
23 not have possibly provided unbiased services. In fact, multiple lawyers have contacted  
24 Victim/Witnesses's who turned out to be working for the opposition. They were sent in to delay, or  
25 redirect, Victim/Witnesses's in order to keep the cases from being filed or properly prosecuted in  
26 order to protect the suspects. This is a common infiltration procedure widely documented in CIA,  
27 British secret service, Russian FSB and Snowden leaks documents on IC dirty tricks tactics.  
28

1  
2 **H.** Agency staff were ordered to harm Victim/Witnessess by manipulating their benefits in order to  
3 deny, delay, obfuscate and reduce their income as reprisal for their assistance to law enforcement in  
4 a political corruption and money laundering matter. Agency staff, ranging from the lowest level  
5 staff and up to the director headquarters offices, participated in this reprisal-vendetta-revenge action  
6 to harm Victim/Witnessess. Victim/Witnesses's peers have filed DOJ and FBI criminal referrals,  
7 launched federal investigations and the assertions have been proven in numerous IG, FBI,  
8 Congressional and major news media investigations. Agency offices have failed to provide  
9 responsive FOIA requested data, hearing investigation data and fair responses because some of their  
10 staff are STILL operating a criminal cover-up which has now been update-reported to the FBI,  
11 Congress, the IG, the AG and investigative reporters.  
12

13  
14 Other federal agencies have complied, verified and provided the requested deliverables. SSA and  
15 GOVT have pointed the searchlight of suspicion on themselves, laser-like, by their overt failure to  
16 comply. Ironically, the political financing of their executives and their personal relationships  
17 "happens" to be with the exact same Silicon Valley oligarchs under felony criminal investigations.  
18 The stock market brokerage records, family trust accounts, PAC trace-routing, Interpol records and  
19 SEC investigation records proves it!  
20

21  
22 Every "unsigned" anonymous government email is tracked to the individual author by their IP  
23 address, device IMEI, web camera, building key card, door camera, parking lot use chart, building  
24 camera, vehicle tracking circuits, text dba records, keyboard UI/UX patterns, motherboard ID #,  
25 DNS routing, stingray read-outs and a vast number of other metrics. Victim/Witnesses investigation  
26 peers know the exact person that wrote every government email or document or file request.  
27  
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1 Stone-walling based cover-ups are being mitigated by Victim/Witnesses', and their peers, by  
2 carbon-copying these disclosures to every member of the press, every voting citizen and every  
3 jurisdiction agent.

4  
5 For years, victim/Victim/Witnesses's, and their advocates and peers, have contacted every  
6 government agency and authority listed in government directories, which may have any jurisdiction  
7 over this case. The usual response has been cover-ups, finger-pointing, stone-walling, obfuscation,  
8 failure-to-reply or other tactics to delay the inevitable. This has forced victim/Victim/Witnesses's to  
9 use social media and novel distribution technologies to present their case to every registered voter in  
10 the public. Agency officials who were supposed to be helping victim/Victim/Witnesses's have been  
11 exposed taking bribes from victim/Victim/Witnesses' enemies and adversaries in this case.

12  
13 Certain California State officials, Obama White House Staff and Federal Agency staff  
14 **accepted bribes** from Silicon Valley Oligarchs and Investment Bank Cartels. They were bribed  
15 with: Billions of dollars of Google, Twitter, Facebook, Tesla, Netflix and Sony Pictures stock and  
16 stock warrants which is never reported to the FEC; Billions of dollars of Google, Twitter, Facebook,  
17 Tesla, Netflix and Sony Pictures search engine rigging and shadow-banning which is never reported  
18 to the FEC; Free rent; Male and female prostitutes; Cars; Dinners; Party Financing; Sports Event  
19 Tickets; Political campaign printing and mailing services "Donations"; Secret PAC Financing; Jobs  
20 in Corporations in Silicon Valley For The Family Members of Those Who Take Bribes And Those  
21 Who Take Bribes; "Consulting" contracts from McKinsey as fronted pay-off gigs; Overpriced  
22 "Speaking Engagements" which are really just pay-offs conduited for donors; Gallery art; Private jet  
23 rides and the use of Government fuel depots (ie: Google handed out NASA jet fuel to staff);  
24 Recreational drugs; Real Estate; Fake mortgages; The use of Cayman, Boca Des Tores, Swiss and  
25 related money-laundering accounts; The use of HSBC, Wells Fargo, Goldman Sachs and Deutsche  
26 Bank money laundering accounts and covert stock accounts; Free spam and bulk mailing services  
27 owned by Silicon Valley corporations; Use of high tech law firms such as Perkins Coie, Wilson  
28 Sonsini, MoFo, Covington & Burling, etc. to conduit bribes to officials; Payroll W2 and 1099

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1 payments which were actually bribe payments for political work such as character assassinations  
2 and internet rigging; and other means now documented by us, The FBI, the FTC, The SEC, The  
3 FEC and journalists.

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**EXHIBIT 53 - The Office Of The Special Counsel (OSC) Is Not Your Friend**

While the “OSC” makes people think of the victory over corruption at the Watergate hearings, that is about the only good thing OSC has ever done. Most people now think OSC stands for: *The Office Of Shredding And Corruption*.

OSC gathers the tips about corruption and then makes sure those tips never see daylight.

The head of the U.S. Office of Special Counsel (OSC), Scott J. Bloch, pleaded guilty to criminal contempt of Congress for willfully and unlawfully withholding pertinent information from a House committee investigating his decision to have several government computers wiped, announced U.S. Attorney for the District of Columbia Ronald C. Machen Jr., Office of Personnel Management (OPM) Inspector General, Patrick McFarland, and FBI Assistant Director in Charge Shawn Henry.

The plea was entered before U.S. Magistrate Judge Deborah A. Robinson in U.S. District Court for the District of Columbia, who scheduled sentencing for July 20, 2010. Bloch faces a maximum sentence of one year in jail and a fine of \$100,000. Bloch’s likely sentencing range is zero to six months in jail under the federal sentencing guidelines.

The OSC is an independent federal agency charged with safeguarding the merit-based employment system by protecting federal employees and applicants from prohibited personnel practices, with an emphasis on protecting federal whistleblowers. Bloch, a presidential appointee whose title was Special Counsel, headed the OSC from 2004 through 2008.

According to the statement of offense, on March 4, 2008, Bloch submitted to a transcribed interview with staff members of the U.S. House of Representatives Committee on Oversight and Government Reform, which was investigating, among other things, whether and why Bloch: directed the deletion of e-mails or files on any of Bloch’s OSC-issued computers in December of 2006 by using the computer repair service Geeks On Call; directed that the computer repair service delete e-mails or files contained on the computers of two of his OSC aides; and directed that any such deletion of computer files be done by use of a “seven-level wipe” process. This duly

1 empowered congressional inquiry came after various media reports that Bloch had directed the  
2 deletion of files on several OSC-issued computers by using the repair service.

3 The statement of offense describes five separate exchanges during Bloch's March 4, 2008,  
4 interview with staff members of the House Oversight Committee during which Bloch unlawfully  
5 and willfully withheld pertinent information from the committee. Bloch admitted in court today that  
6 he refused and failed to state fully and completely the nature and extent of his instructions that  
7 Geeks On Call perform "seven level wipes" on his OSC computers as well as the two OSC-issued  
8 computers of two non-career OSC staff members in December 2006.

9 In announcing today's guilty plea, U.S. Attorney Machen, Inspector General McFarland,  
10 and Assistant Director in Charge Henry praised the outstanding work of the investigative agents  
11 involved in this matter, especially Special Agent Marc R. Diehl and Andrew Smallman of the FBI;  
12 as well as Jill P. Maroney, Deputy Assistant Inspector General for Investigations; and J. David  
13 Cope, Assistant Inspector General for Legal Affairs of OPM. They also acknowledged the hard  
14 work of Paralegal Specialists Diane Hayes and Mary Treanor; Legal Assistant Jamasee Lucas;  
15 former Legal Assistant April Peeler; Supervisory IT Specialist Joe Calvarese; and Assistant U.S.  
16 Attorneys Laurel Loomis Rimon, Dan Butler, James Mitzelfeld, and Glenn S. Leon, who is  
17 prosecuting the case.

18 During the Bloch era, the OSC was criticized for (1) very rarely recognizing legitimate  
19 whistleblowers, typically only when the whistleblower had already prevailed elsewhere; (2) taking  
20 too long to investigate meritorious cases; (3) using a conservative litmus test in hiring; (4)  
21 discouraging federal whistleblowers from using their legal protections, and (5) generally siding with  
22 the federal administration instead of with the whistleblowers it was supposed to protect.[\[40\]](#)[\[41\]](#)

23 On March 22, 2007, U.S. Senator [Daniel K. Akaka](#) (Democrat, [Hawaii](#)), Chairman of the  
24 [Subcommittee on Oversight of Government Management, the Federal Workforce, and the District](#)  
25 [of Columbia](#), held a hearing on "Safeguarding the Merit System Principles." In his opening  
26 statement, Sen. Akaka stated, "organizations that help whistleblowers claim that OSC has gone  
27 from being their first option for relief to their last choice since OSC no longer works with agencies  
28 to achieve informal relief and the percentage of corrective actions and stays has been cut in half

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1 since 2002."[\[42\]](#)

2           OSC protects the seated President and the most powerful politicians who have the biggest  
3 war chests.

## **EXHIBIT 54 - How Government Agencies Were Used As Reprisal Weapons Against Plaintiffs**

The San Mateo, California Social Security Administration offices are under investigation because one, or more, of their staff used SSA resources to attack an Victim/Witnesses because a staff member (erroneously) thought that an Victim/Witnesses was opposed to that SSA staffer's beliefs on "open-borders". The SSA official ordered up reprisal operations, against the Victim/Witnesses, simply to vent that SSA officials political angers. That is illegal.

A vast number of agency abuse cases and lawsuits are now on public record in the Inspector General's offices and federal courts.

It is an indisputable fact that some government agencies run "hit-jobs" on citizens on orders from certain corrupt politicians. These actions are felony violations of the law.

Federal and State Agencies including SSA, FEC, GOVT, HHS, VA, CIA, HUD, SA, SEC, FBI, DOJ and many others, have been charged, and found guilty, in these crimes against citizens.

In the Congressional investigation published by the United States Congress in review of the U.S. Department of Energy LGP/ATVM programs, it is clearly proven that the U.S. Department of Energy was used as a slush-fund by some GOVT executives in order to pay off campaign financiers by attacking and sabotaging their competitors.

The GOVT Paducah Gaseous Diffusion Plant under contracts with The U.S. Government and the government-owned U.S. Enrichment Corp paid \$5M whistle-blower awards to those whistle-blowers who were attacked, using government agency resources, for reporting a crime.

Dept. of Energy Hanford URS has agreed to settle a lawsuit brought by former employee Walter Tamosaitis for \$4.1 million. The settlement in the whistle-blower case comes almost one year before the case was set for a jury trial in federal court in Richland and compensates Tamosaitis for attacks against him, by GOVT officials, in retribution for reporting a crime.

VA officials attacked hundreds of citizens who reported corruption, ie:  
<https://www.thenewamerican.com/usnews/health-care/item/18610-va-whistleblowers-facing->



1 retribution.

2 As shown in this report: [https://www.pogo.org/analysis/2018/08/new-report-confirms-](https://www.pogo.org/analysis/2018/08/new-report-confirms-whistleblower-retaliation-is-alive-and-well-at-department-of-veterans-affairs/)  
3 [whistleblower-retaliation-is-alive-and-well-at-department-of-veterans-affairs/](https://www.pogo.org/analysis/2018/08/new-report-confirms-whistleblower-retaliation-is-alive-and-well-at-department-of-veterans-affairs/)

4 , Agencies attack often and harshly.

5 CIA and NSA executives have been widely shown to use spy tools to attack domestic  
6 citizens they don't like, ie: [https://www.dailymail.co.uk/news/article-2435011/NSA-employees-](https://www.dailymail.co.uk/news/article-2435011/NSA-employees-used-phone-tapping-tools-spy-girlfriends-cheating-husbands.html)  
7 [used-phone-tapping-tools-spy-girlfriends-cheating-husbands.html](https://www.dailymail.co.uk/news/article-2435011/NSA-employees-used-phone-tapping-tools-spy-girlfriends-cheating-husbands.html) , and hundreds of other news  
8 links that can be provided.

9 Elon Musk and Tesla, as well as Eric Schmidt and Larry Page at Google, have been proven  
10 to use the CIA group: IN-Q-TEL, to run government sponsored/financed attacks on business  
11 competitors.

12 In Civil Action No. 1:13-cv-00777-RBW GOVERNMENT AGENCIES WERE CAUGHT  
13 BEING USED FOR ATTACKS AGAINST CITIZENS AND PUNISHED IN THE COURT AND  
14 THE MEDIA!

15 The IRS, and hordes of other government agencies have been caught and proven, IN  
16 COURT, to target and attack people for presumed political differences.

17 Why should we assume that the Social Security Administration is not ALSO doing this too  
18 to harm citizens who speak out?

19 The Lois Lerner IRS attacks took many years to resolve. In an unprecedented victorious  
20 conclusion to a four year-long legal battle against the IRS, the bureaucratic agency admitted in  
21 federal court that it wrongfully targeted citizens, during the Obama Administration, because of their  
22 political viewpoints and issued an apology to those people for doing so.

23 In addition, the IRS is consenting to a court order that would prohibit it from ever engaging  
24 in this form of unconstitutional discrimination in the future.

25 In a proposed Consent Order filed with the Court, the IRS has apologized for its treatment of  
26 U.S. citizens including organizations from 20 states that applied for 501(c)(3) and (c)(4) tax-exempt  
27 status with the IRS between 2009 and 2012 -- during the tax-exempt determinations process.

28 Crucially, following years of denial by the IRS and blame-shifting by IRS officials, the agency now

1 expressly admits that its treatment of our clients was wrong and a total violation of our Democracy..

2 As set forth in the proposed Order:

3 “The IRS admits that its treatment of Victim/Witnesses's during the tax-exempt  
4 determinations process, including screening their applications based on their names or policy  
5 positions, subjecting those applications to heightened scrutiny and inordinate delays, and  
6 demanding of some Victim/Witnesses' information that TIGTA determined was unnecessary to the  
7 agency’s determination of their tax-exempt status, was wrong. For such treatment, the IRS  
8 expresses its sincere apology.”

9 Throughout litigation of this case, activists have remained committed to protecting the rights  
10 of the public who faced unlawful and discriminatory action by the IRS and other agencies. The  
11 objective from the very beginning has been to hold agencies accountable for corrupt practices.

12 This Consent Order represents a historic victory for the public and sends the unequivocal  
13 message that a government agency’s targeting of citizens organizations, or any organization, on the  
14 basis of political viewpoints, will never be tolerated and that revenge will be swift and vast.

15 The Order will put an end, once and for all, to the abhorrent practices utilized against  
16 citizens, as the agreement includes the IRS’s express acknowledgment of – and apology for – its  
17 wrongful treatment of the public. While this agreement is designed to prevent any such practices  
18 from occurring again, rest assured that all public interest lawyers will remain vigilant to ensure that  
19 the IRS, SSA, DOJ or SEC does not resort to such tactics in the future.

20 Per detailed reports, in March of 2012 lawyers began being contacted by literally dozens of  
21 citizens and groups who were being harassed by the Obama IRS after submitting applications for  
22 tax-exempt status. Their tax-exempt applications were held up for years (over seven years in some  
23 cases), and they began receiving obtrusive and unconstitutional requests for donor and member  
24 information. That began a now more than five and a half year fight with the burgeoning bureaucracy  
25 at the IRS. Then on May 10, 2013, Lois Lerner, the then head of the IRS Tax Exempt Organizations  
26 Division, publicly implicated the IRS in one of the worst political targeting scandals of the century.

27 This is an extraordinary victory against government agency abuse. It sends a powerful  
28 warning to the deep state bureaucracy that it will not be allowed to violate the Constitution in order

1 to silence and shut down the whistle-blowers.

2 In addition to the IRS's admissions of and apology for its wrongful conduct, the Consent  
3 Order would specifically award Victim/Witnesses's the following:

4 - A declaration by the Court that it is wrong to apply the United States tax code to any tax-  
5 exempt Victim/Witnesses or entity based solely on such entity's name, any lawful positions it  
6 espouses on any issues, or its associations or perceived associations with a particular political  
7 movement, position or viewpoint;

8 - A declaration by the Court that any action or inaction taken by the IRS must be applied  
9 evenhandedly and not based solely on a tax-exempt Victim/Witnesses or entity's name, political  
10 viewpoint, or associations or perceived associations with a particular political movement, position  
11 or viewpoint; and

12 - A declaration by the Court that discrimination on the basis of political viewpoint in  
13 administering the United States tax code violates fundamental First Amendment rights. Disparate  
14 treatment of taxpayers based solely on the taxpayers' names, any lawful positions the taxpayers  
15 espouse on any issues, or the taxpayers' associations or perceived associations with a particular  
16 political movement, position or viewpoint is unlawful.

17 In the Order, the IRS has also agreed that (unless expressly required by law) certain actions  
18 against the Victim/Witnesses's- i.e. the sharing, dissemination, or other use of information  
19 unnecessarily obtained by the IRS during the determinations process (such as donor names, the  
20 names of volunteers, political affiliations of an organization's officers, etc.) – would be unlawful. In  
21 addition, the IRS promises not to take any retaliatory action against our clients for exposing the  
22 targeting scheme.

23 Finally, and of crucial significance, the IRS admits it targeted persons and groups based on  
24 their viewpoints (i.e., "policy positions") and that such viewpoint discrimination violates  
25 fundamental First Amendment rights. This is the first time the IRS has admitted that its targeting  
26 scheme was not just "inappropriate" – as TIGTA found – but, as alleged, blatantly unconstitutional.

27 To ensure consistency and uniformity within the agency's operations going forward, the IRS  
28 is required, pursuant to the Order, to inform all employees within the Exempt Organizations

1 Division, as well as the Commissioners and Deputy Commissioners within other divisions, of the  
2 Order's terms.

3 This Order not only validates allegations about their treatment at the hands of the corrupt  
4 Obama-era IRS but also provides important assurances to the American public that the agency  
5 understands its obligation to refrain from further such discriminatory conduct. As Attorney General  
6 Sessions acknowledged in this regard, "[t]here is no excuse for [the IRS's] conduct," as it is  
7 "without question" that the First Amendment prohibits the conduct that occurred here, i.e.,  
8 subjecting American citizens to disparate treatment "based solely on their viewpoint or ideology."  
9 Sessions further confirmed his Department's commitment to ensuring that the "abuse of power" in  
10 which the IRS engaged here "will not be tolerated."

11 It is impossible to overstate the importance of this victory. This marks a years-long fight for  
12 justice in defense of the constitutional rights of the public.

13 This is an extraordinary victory against abuse of power and corruption.

14 It sends a powerful warning to the deep state bureaucracy that it will not be allowed to  
15 violate the Constitution and manipulate the IRS, SSA and other agencies in order to silence and shut  
16 down those who speak out about political corruption crimes.

17 In the wake of Wisconsin Watchdog's investigation into SSA staff allegations of  
18 incompetence, misconduct, and retaliation in Social Security disability appeals offices, several  
19 employees have taken their complaints to a Senate committee led by Wisconsin Sen. Ron Johnson.

20 An official with knowledge of the complaints said the Senate Homeland Security and  
21 Governmental Affairs Committee, chaired by the Oshkosh Republican, has received emails and  
22 other contacts from "certain people" inside the Social Security Administration's Office of Disability  
23 Adjudication and Review.

24 The initial complaints came from an employee inside the Milwaukee office following  
25 Wisconsin Watchdog's opening investigative report that found some claimants waiting more than  
26 1,000 days for an appeals decision on their disability benefits claim.

27 Following Wednesday's story of a whistleblower in the Madison ODAR office, the  
28 committee has received more specific complaints about retaliation against employees, the source

1 said.

2 Committee staff members sent the latest Watchdog piece to SSA administrators hoping they  
3 will “cooperate,” the source said. To date, the agency has been less than cooperative.

4 “This is an ongoing process, and they are not always as forthcoming as we’d like them to  
5 be,” the source said. “Hopefully with your continued reporting, this is an issue they can’t duck.”

6 A Senate committee member said officials there are working with the Office of Special  
7 Counsel on “multiple whistleblower retaliation claims.” The committee continues to request  
8 information from the SSA.

9 The whistleblower in the Madison office claims management retaliated against her after she  
10 was called to testify in a misconduct case. The incident involved “inappropriate behavior” by an  
11 administrative law judge, she said.

12 “They are so corrupt. It’s absolutely horrible,” said the woman, a lead case technician in the  
13 Madison Office of Disability Adjudication and Review.

14 She spoke on condition of anonymity, fearing more retribution from her supervisors. While  
15 she said recounting her particular experiences will more than likely betray her identity anyway, the  
16 ODAR case worker insisted she has had enough.

17 “I’m at point where they don’t care about me, I don’t see why I’m protecting them. This is  
18 my last resort,” she said. “I want to do my work without fear of retaliation.”

19 She said she has contacted the Senate committee.

20 “I forwarded my information to them and I got an email back from them. They said people  
21 are coming out of the woodwork with their complaints (about ODAR) following your story,” the  
22 whistle-blower said.

23 Ronald Klym, a long-time senior legal assistant in the Milwaukee ODAR office, alleges he  
24 has been retaliated against by supervisors for going public with his charges of incompetence and  
25 misconduct in the agency. The federal employee, who has worked for SSA for 16 years, provided  
26 Wisconsin Watchdog with documents showing extremely long wait times for claimants appealing  
27 their denied applications for benefits.

28 Doug Nguyen, SSA regional spokesman, in a previous story said the agency acknowledges

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1 that Milwaukee ODAR has a “high average processing time for disability appeal hearings, and we  
2 are working to address the issue.”

3 Beyond the delays is what Klym calls the “shell game,” the wholesale transferring of cases  
4 to other parts of the country by administrators to make the Milwaukee office’s numbers look better  
5 than they are.

6 The Madison office whistle-blower confirmed Klym’s allegations, saying at one point she  
7 saw 2,000 cases from the Milwaukee office handed off to the Oak Brook operation.

8 There are over 10,000 SSA disability manipulation charges against SSA executives and  
9 staff. There are over 185,000 charges filed by domestic citizens against all of the parties we listed in  
10 our ***reported-to*** list above.

**EXHIBIT 55 - How Plaintiffs And The Members Of The Public Were Harmed, Specifically**

"Victim/Witnesses A" and his co-workers were cooperating with agency investigations into organized crime operating within government agencies. In order to discourage, threaten and intimidate "Victim/Witnesses A", he and his peers were attacked with a \$30M+ state-sponsored reprisal attack which included the following attack tactics, operated by Fusion GPS, Black Cube, Psy-Ops type contractors and White House specialists, which caused quantifiable harms and damages for which "Victim/Witnesses A" is owed compensation:

- 1.) Defrauding Victim/Witnessess via fake government requests to invest in rigged government contracts, thus costing Victim/Witnesses' their life savings;
- 2.) Placing moles in, and spying inside, Victim/Witnesses's companies;
- 3.) Blockading legal counsel for Victim/Witnesses's;
- 4.) Character assassination and sophisticated contracted defamation media attacks;
- 5.) Defendants contracted off-shore "click-farm" and "troll-factory" processed social media attacks;
- 6.) Government benefits from SSA, HUD, etc, blockades and manipulations;
- 7.) Jobs and venture capital funding blacklisting;
- 8.) FOIA obfuscation for official government FOIA filings;

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- 1 9.) Arbitrary government deadline manipulation for SSA, GOVT, HUD and other applications;
- 2
- 3 10.) Creation of endless fake hurdles in agency applications (ie: GOVT) to protect rigged
- 4 "winners";
- 5
- 6 11.) Toxic workplace poisonings like the Salisbury, Nalvany, Litvinenko poisonings;
- 7
- 8 12.) Workplace sabotage and obstruction of Victim/Witnesses's companies;
- 9
- 10 13.) Contracted media defamation attacks via Gawker, Gizmodo, Jalopnik, Google, Youtube, etc.
- 11 Which have now had the payments for the attacks tracked through accounting systems
- 12
- 13 14.) Commercial employment database "Lois Lerner-ing" and red-flagging;
- 14
- 15 15.) Murders or forced deaths of peers (ie: Rajeev Motwani, Seth Rich, Gary D. Conley and 120+
- 16 others);
- 17
- 18 16.) Revenue blockades and internet income re-direction;
- 19
- 20 17.) Troll farm attack teams hired from Chinese attack farms;
- 21
- 22 18.) Fusion GPS, Media Matters, David Plouffe attack contracts issued targeting whistle-blowers;
- 23
- 24 19.) Manual search engine lock-in attacks on Google, YouTube, LinkedIn;
- 25
- 26 20.) U.S. patent office manipulation to blockade revenue;
- 27
- 28 21.) Honey-traps sent out targeting the whistle-blowers;



22.) Fake news tabloid empires created just for defamation attacks;

23.) Housing access and financing blockades created to reprisal harass whistle-blowers;

24.) Ongoing hacking of Victim/Witnesses's devices;

25.) Tech industry black-list coordination within the National Venture Capital Association;

26.) HUD and USDA mortgage rights blockades;

27.) DNS and IP routing manipulation to prevent Victim/Witnesses' from selling anything online;

28.) Digital attacks designed to put horrific fake news about target in front of 7.5 billion people...

and more spy agency type "dirty tricks" that cost the Victim/Witnesses' their lives, life savings, income and other disabling losses as detailed in the related support documents on the case website.

**Victim/Witnesses' have currently had their rights to legal representation and a trial blockaded by government officials who fear political embarrassment in a public trial of this case. In fact, history has proven that those officials have caused a thousand-fold increase in their own public media shame by delaying a settlement of this dispute!**

**EXHIBIT 56 – Further Details On The Demand By Victim/Plaintiffs**

**What The Government And Corrupt Defendants Need To Do To Offset The Harm They Caused:**

- Victim/Victim/Witnesses' demands the provision of a state-sponsored court-provided law firm to represent victim/Victim/Witnesses' under the variances and human rights laws affording such provision of services.

- The finding that this matter includes a violation of RICO racketeering laws and Anti-trust laws by the combined organized efforts of the Defendants.

- Awarding Victim/Witnesses' compensatory including actual, consequential, and incidental damages for malicious defamatory conduct as alleged herein in an amount to be determined at trial and in excess of \$35,000,000 U.S. Dollars.

- Awarding punitive damages for Defendant's malicious defamatory conduct based on the routine and accepted calculation of 5 percent of their invested current net worth of over \$63 billion U.S. dollars. Thus, punitive damages are requested be awarded by the in an amount to exceed \$3 billion U.S. dollars, which amount of punitive damages are designed to sufficiently punish Defendant in order that its illegal conduct not reoccur.

- Awarding Victim/Witnesses' attorney's fees and costs.

- Granting any such further relief as the Court deems appropriate including preliminary and permanent injunctive relief.

- Damages in excess of \$225 million against Chu, Axelrod, Podesta, Carny, Biden, Emanuel, Gibbs, Rattner and Seward, jointly and severally, for their violations of Victim/Witnesses"s civil rights.

- A declaration pursuant to 28 U.S.C. §§ 2201 and 2202 and 5 U.S.C. § 706(2)(B) that Victim/Witnesses"s Loan Program application was wrongfully denied and injunctive relief directing Defendants to reconsider and/or approve same.

- A declaration pursuant to 28 U.S.C. §§ 2201 and 2202 and 5 U.S.C. § 706(2)(B) Victim/Witnesses"s ATVM Loan Program application was wrongfully denied and injunctive relief

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1 directing Defendants to reconsider and/or approve same without respect for political considerations.

2 - A declaration pursuant to 28 U.S.C. §§ 2201 and 2202 and 5 U.S.C. § 706(2)(B) that the  
3 rejection of Victim/Witnesses's LGP application without recourse was unlawful, and injunctive  
4 relief directing Defendants to accept and consider same without respect for political considerations.

5 - Such costs and attorney fees as Victim/Witnesses's may be entitled to under law.

6 - Such other relief as this Court deems just.

7 - Victim/Witnesses' have sent an invoice for “*informant and witness fees*” to the GAO, FBI,  
8 FTC and SEC in the amount of \$5,000,000.00 per agency but have not had a response, relative to  
9 payment, from those agencies.

**EXHIBIT 57 - How Much Have Others Been Paid For The Same Damages?****Reference past payment precedent examples:**

- Campbell worked as an informant for federal authorities investigating Vadim Mikerin, a Russian official in charge of U.S. operations for Tenex, a unit of Rosatom. Authorities later accused Mikerin of taking bribes from a shipping company in exchange for contracts to transport Russian uranium into the United States. He pleaded guilty in federal court in Maryland and was sentenced to prison for four years. The Justice Department had also initially charged Mikerin with extorting kickbacks from Campbell after hiring him as a \$50,000-a-month lobbyist. Prosecutors alleged Mikerin had demanded Campbell pay between one-third and half of that money back to him each month under threat of losing the contract and veiled warnings of violence from the Russians. The demand prompted Campbell to turn to the FBI in 2010, which gave its blessing for him to remain part of the scheme as a whistle-blower who was compensated for his efforts.

- The FBI has a Congressional docket which documents it's annual witness and informant expenditures for the last 20 years. Those financial on-the-record documents show the average payment for a high-ticket case RICO-type informant such as Victim/Witnesses' and are hereby placed in this case record as references of payment standards.

- In a similar case, Victim/Witnesses' Terry Bollea (AKA: Hulk Hogan) was awarded \$145 million dollars in damages because of character assassination efforts by the same parties. The attacks on Victim/Witnesses's exceeded the resources used against Terry Bollea by many magnitudes and thus, the \$145 million dollar figure would be a minimum damages figure for each Victim/Witnesses' in our case as each Victim/Witnesses was attacked in such a manner. Each of the parties attacked by Gawker/Gizmodo (who worked for White House operatives) received at least \$170,000.00 in damages.

- The GOVT Paducah Gaseous Diffusion Plant under contracts with The U.S. Government and the government-owned U.S. Enrichment Corp paid \$5M whistle-blower awards to those whistle-blowers who were attacked, using government agency resources, for reporting a crime.

- <https://www.foxbusiness.com/markets/deutsche-bank-whistleblower-gets-200-million->

bounty-tip-libor-misconduct

- Adam Lovinger, a 12-year veteran of the Pentagon's Office of Net Assessment (ONA), filed a whistleblower reprisal complaint with the Defense Department's inspector general in May against ONA boss James Baker and received compensation for his whistle-blower efforts.

- A Tesla whistle-blower was awarded \$150 million.

- The FBI's informant in the Uranium One scandal involving the Obama administration gave written testimony to three congressional committees this week in which he accused the Obama administration of making decisions that directly benefited the Russian government and their goals of gaining geopolitical advantages over the United States. The informant, Douglas Campbell, told congressional investigators on Wednesday that Moscow sent millions of dollars to the U.S. with the expectations that it would benefit the Clinton's, while Hillary Clinton "quarterbacked a 'reset' in US-Russian relations" in her role as Secretary of State during the Obama administration, The Hill reported. The FBI found Campbell's undercover work valuable enough to reward him with a \$50,000 check in 2016.

- Dept. of Energy Hanford URS has agreed to settle a lawsuit brought by former employee Walter Tamosaitis for \$4.1 million. The settlement in the whistle-blower case comes almost one year before the case was set for a jury trial in federal court in Richland and compensates Tamosaitis for attacks against him, by GOVT officials, in retribution for reporting a crime.

- In **Civil Action No. 1:13-cv-00777-RBW**, government agencies were caught being used for attacks against citizens and punished in the court and the media! The IRS, and hordes of other government agencies have been caught and proven, IN COURT, to target and attack people for presumed political differences

- Some of the biggest evidence-of-loss examples are found in the financial records from General Motors, Ford Motors, Nissan and Tesla Motors executives for the time-frame from Jan. 1, 2000 to today. Those records validate the income loss to Victim/Witnesses'.

- Over 400+ other cases decisions, settlement records and government payment precedents are on file at <http://www.pacer.gov> validating the amount that Victim/Witnesses' should be compensated via known and quantified precedents.

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**EXHIBIT 58 - One Example Of The Corruption Experience**

A part of this case documents a state-sponsored attack on a technology manufacturer who was promised a level playing field in its applications for funds to government entities, only to be unfairly denied and financially and detrimentally attacked and harmed, in political and anti-competitive reprisal, in the process. In the course of the investigation, an organized crime Cartel was exposed in operation among Silicon Valley technology oligarchs and well-known political representatives.

This section, below, shows how investigative lawyers and FBI experts broke down the facts in a portion of the case:

1. This case has exposed cronyism at government agencies, The White House and among U.S. Senators.
2. This case represents the Victim/Witnesses' of the crime as well as taxpayers who deserve an open, transparent, and fair government process without the current layers of bribery and stock market payola quid pro quo.
3. The government should immediately grant Declaratory and Injunctive Relief, retribution fees and other damages to Victim/Witnesses'

**Key Points:**

(a) Funding granted through, for example: the GOVT's Loan Guarantee Program (LGP ) and Advanced Technology Vehicle Manufacturing (ATVM) loan programs, and other agencies, are administered in an arbitrary and capricious manner, inconsistently favoring some and disadvantaging other "outsider" non-crony Victim/Witnessess; lacked mechanisms for Victim/Witnessess to administratively appeal its decisions; and re-reviewed rejected applications on an ad hoc and biased basis in order to protect the friends of government staff and harm their competitors.

(b) Victim/Witnesses' ATVM application was deliberately "set aside", hidden,

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1 delayed, stone-walled and substantially “delayed consideration” by GOVT in  
2 favor of loan applications from politically-connected government cronies like  
3 Tesla and Fisker, whose top executives and investors, Steve Westly (Tesla), Tim  
4 Draper (Tesla) and John Doerr (Fisker) donated millions to Democrats and the  
5 Obama Administration in 2008.

6 (c) Many of the loan applications granted by the GOVT went to companies that failed  
7 to produce the promised results, were not innovative in technology, or ultimately  
8 declared bankruptcy (After skimming billions in stock market “pump-and-dump”  
9 profits) with the harm going to the American taxpayers (See Solyndra, Tesla and  
10 Fisker as examples); while Victim/Witnesses' was previously funded by The U.S.  
11 Government and was one of the ONLY entities that did deliver on the contract.

12 (d) Of the \$25 billion that Congress authorized the GOVT to loan, \$16 billion  
13 remains un-disbursed. Why was Victim/Witnesses' \$40 million request not  
14 granted when it could have been used to immediately create jobs?

15 (e) The GOVT violated multiple non-disclosure agreements with Victim/Witnesses'  
16 (and Victim/Witnesses') passing along patented technology to General Motors and  
17 other government cronies and that technology, only after that fact, was displayed  
18 by Ford, General Motors, Tesla and other competitors who were funded by  
19 GOVT.

20 (f) In the case of Victim/Witnesses', we see another example of the GOVT's  
21 cronyism, broken promises to American taxpayers, and misuse of executive  
22 agency influence.

23 (g) This case goes back to the year 2000, and forward, as there were crony political  
24 payments between the White House, Department of Energy, Department of State  
25 and other State and Federal government agency staff coordinated with their  
26 political campaign financier/beneficiaries from Solyndra, Tesla, Fisker, Facebook,  
27 Google, YouTube, Netflix, Linkedin, Alphabet, Kleiner Perkins, Greylock,  
28 Goldman Sachs and other PAC-aligned Silicon Valley businesses to operate a



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RICO-law and Antitrust-law violating illicit business “Cartel” which  
Victim/Witnesses' were “outsiders” to.

**Expanded Points:**

- (a) The U.S. Government engaged in arbitrary and capricious methods when  
awarding loan guarantees through the Advanced Technology Vehicle  
Manufacturing (ATVM) loan program
  - a. The GOVT administers the ATVM loan program, in which Congress  
authorized GOVT to provide direct federal government loans supporting  
the advancement of technology vehicles
  - b. Congress authorized GOVT to make \$25 billion in ATVM loans (GOVT  
currently has approx. \$16 billion of unused lending authority which  
politicians have been constantly trying to grab for themselves).
  - c. At all times relevant, GOVT knew that the ATVM loans had evaporated  
the private markets, and that unduly delaying or denying a small,  
innovative technology company’s ATVM loan likely would scare away  
other private investors and lenders—meaning a business death sentence.
- (b) Victim/Witnesses's are a small business that has demonstrated innovation, energy  
efficiency, and provided technology that can advance green energy efforts and  
create jobs in the United States. They were initially funded by a Congressional  
award and a Department of Energy commission.
  - a. In November, 2008 at the request of government officials,  
Victim/Witnesses' applied for an ATVM loan to build a scalable,  
innovative and efficient electric car. This car would have obsoleted Tesla  
Motors, which paid profits to ATVM bosses, staff, consultants and related  
Senators. The metrics ( Range, Safety, Price, Cost To Produce, Energy  
Efficiency, Use of Domestic Labor, Avoidance of Genocide-based Mining,  
etc.) of that car, and almost every other Victim/Witnesses beat Tesla by  
many magnitudes. Any Victim/Witnesses who might affect Tesla’s market

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1 was black-listed in order to protect Senator's and GOVT staff stock market  
2 profits. Elon Musk had been promised a 10,000% boost over any  
3 competitor, using federal resources. This was a violation of federal RICO  
4 and anti-trust laws.

- 5 b. Victim/Witnesses' design cost less than \$20,000 in base configuration,  
6 required no gasoline or extension cords to charge, was easy to repair and  
7 build, and used crash effect reduction materials.
- 8 c. All of the Victim/Witnesses' car's key parts were built and tested or  
9 already existed in off-the-shelf components proven in the industry for over  
10 a decade.
- 11 d. Victim/Witnesses' offered GOVT asset collateral of over \$100 million to  
12 secure the ATVM loan
- 13 e. On December 2, 2008, GOVT Director of Advanced Technologies  
14 Manufacturing Loan Program Lachlan Seward wrote to Victim/Witnesses'  
15 acknowledging receipt of its application and requesting certain  
16 information, which Victim/Witnesses' then provided.
- 17 f. On December 31, 2008, Seward informed Victim/Witnesses' that its  
18 application was "substantially" complete, and that GOVT would advise  
19 Victim/Witnesses' if it needed additional information during the  
20 application review process.
- 21 g. At all times relevant, Victim/Witnesses' qualified for the ATVM loan  
22 based on GOVT's published material (see additional docs).

23 (c) We see from the examples of Tesla and Fisker that ATVM loans were massive  
24 expenditures that produced few results.

- 25 a. Victim/Witnesses' application was "set aside" by GOVT in favor of  
26 ATVM loan applications from other companies who have not produced  
27 results, therefore wasting taxpayer dollars that were intended to create jobs  
28 and promote better technology and innovation. The other companies

partnered with Goldman Sachs to produce stock market manipulation profits (like Tesla did) but no consumer market-price products.

(d) The government stole technology from Victim/Witnesses', violating non-disclosure agreements, and handed that information to General Motors, Ford, and other companies that received GOVT funding.

a. Victim/Witnesses' had worked with GOVT on applied fuel cell research and commercialization for over a decade.

b. Victim/Witnesses' obtained a grant in 2005 through the power plant development group which it used to develop a battery 3 times more powerful than lithium batteries according to written research by Sandia National Laboratories based on their validation of Victim/Witnesses' patented technologies.

c. Victim/Witnesses' and Victim/Witnesses' signed NDAs with the GOVT and Sandia, a government contractor, which were violated and resulted in General Motors and Ford using Victim/Witnesses' technology.

#### Facts about Victim/Witnesses'

- Key Victim/Witnesses' in this portion of the investigation are a technology start-up comprised of multiple divisions including: 1.) The Auto production group and 2.) the powerplant development group. This is the same structure Tesla Motors, Ford and Nissan have., ie: Tesla sells cars to consumers and powerplants to competitor/customers.
- In September 2008, Victim/Witnesses' became ***the very first Victim/Witnesses*** to file with the U.S. Department of Energy for a development loan under the ATVM Program and also filed applications under the Loan Guarantee Program for Innovative Energy Projects (LGP) established under Title XVII of the Energy Policy Act of 2005.
- A loan application was also filed under the Loan Guarantee Program.
- Victim/Witnesses' provided the following law enforcement and intelligence work credentials: 1.) A signed letter from the Executive Vice President of ASIS welcoming him as

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1 a member of The American Society For Industrial Security, 2.) His Senior Membership  
2 certificate for The Society Of Manufacturing Engineers for his working building counter-  
3 measures technologies, 3.) His State Of California, Department of Consumer Affairs license  
4 and investigator certification, 4.) His American Federation of Police membership  
5 certification, 5.) His Department of Consumer Affairs State-issued investigators ID, 6.) His  
6 California Association of Licensed Investigators membership certification, 7.) His  
7 International Narcotics Enforcement Officers Officers membership certificate, 9.) His copies  
8 of letters from The White House to him, personally, on White House stationary, 10.) His  
9 letters from the Federal Office Of Personnel Management showing ranking in the top  
10 percentile on the West Coast under Homeland Security as 1811-C Criminal Investigator  
11 testing by OPM. 11.) Press clippings from famous cases he worked on. These letters and  
12 documents date back to the 1980's and show that Victim/Witnesses' had participation in, and  
13 interacted with, other senior law and IC staff who would have been capable of supplying  
14 and/or supporting the high-level of charges and validations listed in this document.

- 15 • Victim/Witnesses' filed 3 loan applications in total, back then. One under Victim/Witnesses'  
16 Vehicles in the ATVM Program. One under Victim/Witnesses' in the Loan Guarantee  
17 Program. Another under Victim/Witnesses' in the ATVM program.
- 18 • Victim/Witnesses' application ranked by outside comparison as one of the top company  
19 Victim/Witnessess", was a Forbes top rated company, had top national reviews and press,  
20 top issued patents, top staff references, industry leading staff and vast other positive metrics.
- 21 • Victim/Witnesses' had received funding from GOVT via it's Victim/Witnesses' powerplant  
22 group before and successfully completed a contract with GOVT via it's vehicle power plant  
23 division. GOVT staff told Victim/Witnesses' that oil companies wanted fuel cell's  
24 minimized in GOVT efforts because they competed with oil company interests too  
25 effectively.
- 26 • Victim/Witnesses' had received funding from GOVT before and successfully completed a  
27 contract with GOVT via it's vehicle power plant division.
- 28 • The Victim/Witnesses' Vehicles car goes an almost unlimited range via hot-swap fuel

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cartridges, costs less than \$20,000 in base configuration, uses no gasoline, is easy to repair and build, saves lives better than any other car by using “damp down” crash effect reduction materials like those used in the bumper, dashboard and body of the Prius, is faster than competing solutions, can be recharged as fast as one can pull out an empty fuel cassette and slide in a charged fuel cassette: often in 50% less time than it takes to refill a gasoline vehicle, does not require an extension cord because people living in apartments generally cannot use extension cords, uses electricity and creates green jobs. NO factory needs to be built because Victim/Witnesses' was retasking already existing factories and at very low cost. All of the key parts of the car were built and tested or already existed in off-the-shelf components proven in industry for over a decade. Autodesk and other engineering software allowed for full virtual prototyping and operational testing of the design. The company already has thousands of customers lined up who want to buy their unique and very “green” car. The company hand delivered letters from those customers to the GOVT ATVM office in Washington DC in 2008. The company currently had no significant debt and the company leaders had been contributing their time and resources for many years based on positive feedback received repeatedly by Department of Energy (GOVT) loan reviewers and staff. The company won a semi-finalist position in the prestigious “Forbes: America’s Most Promising Companies” contest.

- Certainly company officials were not claiming that their vehicles will solve all of the world’s energy problems. However with each car that is sold, we will help reduce domestic reliance on imported fuel and reduce environmental C02 by putting a vehicle on the road that uses absolutely no gasoline and creates American Jobs. This vehicle is truly using “advanced technology” via clever configuration of standard off the shelf components available today. – a major goal of this loan program and a key stated goal of the Administration. In addition, with a company that has no current debt, several patents, and thousands of interested customers; the company asserts that GOVT’s financial risk in investing in the technology would be extremely low, and the failures of competitors, as predicted by Victim/Witnesses' staff, who already received funding from the same program

1 validates this assertion. Victim/Witnesses's had the best debt ratio of any Victim/Witnesses,  
2 especially Tesla. Tesla was “cooking the books” with Detroit and Middle East cover cash to  
3 make it temporarily not look as nearly bankrupt as it was.

4 **Facts about GOVT Loans**

- 5 • The Department of Energy’s (GOVT) Loan Programs Office (LPO) administers three  
6 separate programs: the ATVM Loan Program and the Title XVII Section 1703 and Section  
7 1705 loan guarantee programs. The ATVM Loan Program was established by Section 136  
8 of the Energy Independence and Security Act of 2007, and provides direct loans to support  
9 the manufacturing of advanced technology vehicles and qualifying components in the  
10 United States.
- 11 • The Program provides loans to automobile and automobile parts manufacturers for the cost  
12 of reequipping, expanding, or establishing manufacturing facilities in the United States to  
13 produce advanced technology vehicles or qualified components, and for associated  
14 engineering integration costs.
- 15 • In 2010, Section 136 was amended to include ultra-efficient vehicles within the definition of  
16 advanced technology vehicles.
- 17 • The FY 2009 Continuing Resolution (CR), which was enacted on September 30, 2008,  
18 appropriated \$7.5 billion in credit subsidy to support up to \$25 billion in loans under the  
19 ATVM Loan program.
- 20 • The FY 2009 CR also provided GOVT with \$10 million to administer the Program.
- 21 • On November 5, 2008, GOVT issued the Interim Final Rule for the Program.
- 22 • GOVT accomplished this effort in approximately half of the 60-day time-frame  
23 mandated by Congress.
- 24 • The program began receiving applications on December 2, 2008. Victim/Witnesses'  
25 application was the first one because Victim/Witnesses' had been informed they should  
26 apply via Barbara Boxer’s, Jackie Spier’s and Nancy Pelosi’s staff
- 27 • The ATVM Program has received numerous applications from both automobile original  
28 equipment manufacturers (OEMs) and component manufacturers. Most of them have written

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- 1 complaints similar to Victim/Witnesses', about GOVT. (See the Eco-Motors, Zap, Bright  
2 Automotive, Carbon Motors, etc. Complaint documents about GOVT cronyism and lies)
- 3 • The GOVT's Advanced Technology Vehicles Manufacturing (ATVM) Loan Program is a  
4 direct loan program created by Congress to provide funding to automobile manufacturers  
5 and component suppliers to stimulate the development of new fuel efficient technology,  
6 thereby promoting U.S. energy independence by reducing the demand for foreign oil.
  - 7 • ATVM is authorized under Energy Independence Security Act of 2007
  - 8 • The Secretary of the GOVT established the Advanced Technology Vehicle Loan Program  
9 pursuant to Section 136(e) of the Energy Independence and Security Act of 2007, Public  
10 Law 110-140, 42 U.S.C. § 17013
  - 11 • Section 129(a) of the Consolidated Security, Disaster Assistance, and Continuing  
12 Appropriations Act of 2009, Public Law 110-329, appropriated \$7.5 million to the  
13 "Advanced Technology Vehicles Manufacturing Loan Program Account." Section 136(d)  
14 of the 2007 Energy Independence and Security Act authorizes the Secretary to provide no  
15 more than \$25 billion in direct loans to individuals and entities determined by the Secretary  
16 to be eligible for the program. See 42 U.S.C. § 17013(d)(1).
  - 17 • GOVT promulgated an interim final rule on November 12, 2008, which was published at 73  
18 F.R. 66,721 to 66,737. Comments were accepted until December 12, 2008. The Final Rule  
19 was codified at 10 CFR Part 611 (2009).
  - 20 • GOVT reviews applications for the loan program in tranches, with the deadline for the first  
21 tranche initially falling on December 31, 2008 and the deadline for subsequent tranches  
22 falling at the end of every subsequent quarter, until so long as the available funds and loan  
23 authority permit. 73 F.R. 66,721.
  - 24 • Loans are available under the ATVM Loan Program to two classes of Victim/Witnessess  
25 eligible for loans under the program: automobile manufacturers and component  
26 manufacturers. See 10 CFR Part 611.100. Eligibility criteria for automobile manufacturers  
27 that did not manufacture a vehicle in 2005 are described at 10 CFR 611.100(b)(2). In brief,  
28 the Victim/Witnesses must demonstrate that its vehicle's projected combined fuel economy

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is “greater than or equal to the industry adjusted average fuel economy for model year 2005 of equivalent vehicles.” Id. In contrast, component manufacturers need not demonstrate improved fuel economy. 10 CFR 611.100(b)(3).

- Regardless of their classification, Victim/Witnessess must be financially viable without the additional funding provided by the ATVM Loan Program in order to be eligible. 10 CFR 611.100(a)(2). The Secretary is authorized to consider a number of factors to determine financial viability, including:
  - o The Victim/Witnesses’s debt to equity ratio;
  - o The Victim/Witnesses’s earnings before interest, taxes, depreciation, and amortization (EBITDA) for the most recent fiscal year prior to the date of the loan application;
  - o The Victim/Witnesses’s debt to EBITDA ratio;
  - o The Victim/Witnesses’ s fixed charge coverage ratio (EBITDA plus fixed charges divided by fixed charges plus interest expenses);
  - o The Victim/Witnesses’s interest coverage ratio (EBITDA plus fixed charges divided by fixed charges plus interest expenses);
  - o The Victim/Witnesses’s liquidity;
  - o Statements from the Victim/Witnesses’s lenders that the Victim/Witnesses is current; and
  - o Financial projections demonstrating the Victim/Witnesses’s solvency through the life of the loan.
- LGP program authorized under the 2005 Energy Policy and Conservation Act.

Facts about Victim/Witnesses' Government Applications

ATVM

- On or around November 10, 2008 Victim/Witnesses' Vehicles applied to the GOVT ATVM program. Elon Musk had already warned Department of Energy officials to “not fund any of



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1 his competitors or Obama will never finish his first term...”

- 2 • On December 2, 2008, Lachlan Seward wrote to Victim/Witnesses' requested further
- 3 information on Victim/Witnesses' ability to comply with general, financial, technical, and
- 4 environmental requirements.
- 5 • On December 6, 2008, Victim/Witnesses' submitted additional clarification to the GOVT.
- 6 • On December 17, 2008, Victim/Witnesses' had a telephone conversation with Matthew
- 7 McMillen and Walter Eccard of the GOVT.
- 8 • On December 23, 2008, Victim/Witnesses' wrote to Messrs.' McMillen and Eccard
- 9 providing additional information concerning the asset valuation of its patents as well as an
- 10 updated NEPA review statement.
- 11 • On December 29, 2008 Victim/Witnesses' had a telephone conference with Matthew C.
- 12 McMillen concerning National Environmental Policy Act (NEPA) compliance under § 136
- 13 of 10 C.F.R. 611.106. Victim/Witnesses' Vehicles requested \$40,000,000 through the
- 14 ATVM Loan Program based on advice from Congressional officials that that amount was
- 15 “all that would be left in the fund after Detroit got their allocation.”.
- 16 • The application fees for the Loan Gaurantee program cost between \$20,000 and \$100,000.
- 17 The “fees” for the ATVM program were called a “Co-participation fee.” In other words,
- 18 Victim/Witnesses' would have to provide 15-20 % of the loan amount to GOVT up front. If
- 19 Victim/Witnesses' were approved, Victim/Witnesses' would have to pay another \$15 - \$20
- 20 m. or provide in-kind value, and no cash, as the team did in the past
- 21 • Victim/Witnesses' met with venture capitalists in order to get fee money. One in particular
- 22 was a real estate developer in Detroit named Patrick Jett.
- 23 • Victim/Witnesses' also hired Covington and Burling in San Francisco and Washington DC
- 24 as well as other firms in D.C. in order to get help to watch-dog the application.
- 25 • Andrew Beato of Stein Mitchell was one lawyer to Victim/Witnesses' in ATVM
- 26 applications.
- 27 • On December 2, 2008, Lachlan Seward, the Director, Advanced Technology Vehicles
- 28 Manufacturing Loan Program, wrote to the Victim/Witnesses', determining that the

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- 1 submitted application was not substantially complete.
- 2 • On or before December 31, 2008, Victim/Witnesses' submitted materials relating to the
- 3 requirements set forth in Section 611.100 of the Interim Final Rule of the Energy
- 4 Independence and Security Act.
- 5 • On December 31, 2008, Lachlan Seward wrote to the Victim/Witnesses' informing
- 6 Victim/Witnesses' that it was “substantially complete”.
- 7 • At this time other Victim/Witnessess began contacting Victim/Witnesses', who had been on
- 8 network newscasts, asking if “it seemed like GOVT might be rigging the process for favorite
- 9 friends...”
- 10 • The December 31, 2008 letter stated that the GOVT will advise Victim/Witnesses' if it needs
- 11 additional information as it continued the application review process.
- 12 • Victim/Witnesses' alleges that on or after December 31, 2008, Lachlan Seward and Brent
- 13 Peterson began processing the loan materials to secure Victim/Witnesses' funds in January
- 14 2009.
- 15 • Victim/Witnesses' alleges that loan processing was unreasonably terminated due to
- 16 untoward action by the U.S. Department of Energy, including but not limited to John Doerr,
- 17 who was appointed as a member of the USA Economic Recovery Advisory Board by
- 18 President Barack Obama and was a lead investor in GOVT application winners; and other
- 19 members of the “Silicon Valley Cartel” who had quid pro quo deals with the White House.
- 20 • At this point, Google had become one of the primary suppliers of staff to the White House
- 21 and was directing many government decisions. Google was, at that time, in violation of
- 22 Victim/Witnesses's patents and was a silent partner in Tesla Motors. Google ordered White
- 23 House staff to fund, or not fund certain projects and Google was considered to be the most
- 24 powerful member of “The Silicon Valley Cartel”. Had had manipulated most of the internet
- 25 to put Obama in office. Google’s bosses were at the Obama Campaign HQ on the night of
- 26 his election win, coordinating internet manipulations. The article “*The Android*
- 27 *Administration*” in The Intercept, discussed that aspect of the corruption in great detail.
- 28 • On February 1, 2009, Victim/Witnesses' submitted its application for a ATVM Loan under

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- 1 the Department of Energy's Advanced Technology Vehicles Manufacturing Incentive  
2 Program. DO
- 3 • On April 10, 2009, Lachlan Seward wrote to Victim/Witnesses' advising that, as a matter of  
4 law, Victim/Witnesses' proposed project could not be funded under the Program.
  - 5 • On April 11, 2009, Victim/Witnesses' contested the April 10 denial.
  - 6 • On May 13, 2009, The U.S. Government stated that the April 11, 2009 letter "has not  
7 changed our determination that your proposed project can not, as a matter of law, be funded  
8 under the Advanced Technology Vehicles Manufacturing Incentive Program (Program)."
  - 9 • On April 23, 2009, Jason Gerbsman of the ATVM Loan Program at the U.S. Department of  
10 Energy notified Victim/Witnesses' that
    - 11 o Victim/Witnesses' has submitted a substantially complete application and has been  
12 assigned to both a technical eligibility and merit review team, as well as a financial  
13 viability analysis team. The technical team is very close to finishing their evaluations  
14 on both eligibility and project merit, and the financial team will be launching a more  
15 detailed and interactive due diligence phase of the Victim/Witnesses' application  
16 review very soon. Following the technical and financial evaluation under the second  
17 stage of the process, we will move into the underwriting phase where our goal is to  
18 negotiate a conditional commitment, including a detailed term sheet. This will be  
19 followed by the fourth phase of the loan process where the final details will be  
20 negotiated and the loan will be closed.
  - 21 • On May 26, 2009, Jason Gerbsman of the ATVM Loan Program at the U.S. Department of  
22 Energy wrote to Victim/Witnesses' requesting the opportunity to meet, in-person,  
23 concerning the ATVM Loan Application process, including "Victim/Witnesses' next steps."
  - 24 • On June 2, 2009, after Victim/Witnesses' had written to Jason Gerbsman of the ATVM Loan  
25 Program at the U.S. Department of Energy, stating that Victim/Witnesses' "is entering  
26 financial viability phase" of its ATVM application, Mr. Gerbsman responded to  
27 Victim/Witnesses' stating "I look forward to continuing the process with  
28 Victim/Witnesses'."

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- 1 • Between June 22, 2009 and July 19, 2009, Brent Peterson of TMS, Inc, a contractor with the  
2 ATVMIP at the U.S. Department of Energy, and Victim/Witnesses' discussed details of the  
3 Victim/Witnesses' loan application.
- 4 • At no point during this time period did the GOVT communicate that Victim/Witnesses' was  
5 disqualified or ineligible. In fact, all members of GOVT, Congress and other government  
6 offices had said they were “certain” Victim/Witnesses' was about to be funded. All of the  
7 national news stories indicated approval and the massive out-pouring of consumer support  
8 indicated approval.
- 9 • On June 15, 2009, Victim/Witnesses' informed Mr. Peterson that it was a semi-finalist in the  
10 Forbes America’s Most Promising Companies List for 2009.
- 11 • At or around June 15, 2009, Mr. Peterson responded to Victim/Witnesses' June 15, 2009 e-  
12 mail with, “Congrats, thanks for sharing.”
- 13 • On June 29, 2009, Victim/Witnesses' wrote to Jason Gerbsman stating Victim/Witnesses'  
14 applied for ATVM Loan funding in the beginning of November of 2008 (hereinafter “June  
15 29, 2009 Gerbsman Correspondence”).
- 16 • In the June 29, 2009 Gerbsman Correspondence, Victim/Witnesses' alleged it was advised, at the  
17 time by Senate staff, that the funds were to be released by the end of December 2008.
- 18 • In the June 29, 2009 Gerbsman Correspondence, Victim/Witnesses' alleged it had a significant  
19 challenge in waiting such a vast number of months for a simple loan review that was  
20 substantially longer than the commercially reasonable time period exercised by banking  
21 institutions.
- 22 • Due to the U.S. GOVT’s delay, Victim/Witnesses' needed to delay paying staff and had to use  
23 Victim/Witnesses's personal and family savings.
- 24 • In the June 29, 2009 Gerbsman Correspondence, Victim/Witnesses' alleged that when a smaller  
25 car company applies for ATVM funding, it reduces the ability of the company to get other  
26 funding because other financing entities are aware that they cannot compete with ATVM  
27 terms so they forestall decisions until AFTER GOVT terms sheets are issued. GOVT  
28 withheld termsheets in order to cut off all funding options for competitors to the “WINNERS”.

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- 1 • In the June 29, 2009 Gerbsman Correspondence, Victim/Witnesses' alleged all other financing  
2 options are awaiting the GOVT conditional approval letter.
- 3 • In the June 29, 2009 Gerbsman Correspondence, Victim/Witnesses' alleged applying for an  
4 ATVM loan halts funding options for a smaller car company.
- 5 • In the June 29, 2009 Gerbsman Correspondence, Victim/Witnesses' alleged it appeared  
6 unreasonable that a Japanese car manufacturer (Nissan) was awarded funding, especially in  
7 the first round of loan awards, and smaller companies, who need the funding more, were  
8 bypassed.
  - 9 ○ In the June 29, 2009 Gerbsman Correspondence, Victim/Witnesses' alleged that a core  
10 objective of Section 136 of the Energy Independence and Security Act of 2005 was  
11 to put American car manufacturers back in the lead in the green car race, not fund  
12 international competitors as a priority.
- 13 • In the June 29, 2009 Gerbsman Correspondence, Victim/Witnesses' alleged it was informed by  
14 the press that other companies who applied later in the process were moved ahead of  
15 Victim/Witnesses' in the review process because of greater lobby effort expenditures.
- 16 • In the June 29, 2009 Gerbsman Correspondence, Victim/Witnesses' alleged it was operating at a  
17 disadvantage because it simply didn't hire lobbyists or pay any bribes.
- 18 • In the June 29, 2009 Gerbsman Correspondence, Victim/Witnesses' alleged it had been on time,  
19 and ahead of time, in its responses.
- 20 • In the June 29, 2009 Gerbsman Correspondence, Victim/Witnesses' alleged its application was  
21 one of the first deemed, "substantially complete".
- 22 • In the June 29, 2009 Gerbsman Correspondence, Victim/Witnesses' alleged its technology,  
23 price, BOM, TCO and ROI is clearly superior to the other Victim/Witnessess.
- 24 • Victim/Witnesses' forwarding its June 29, 2009 Gerbsman Correspondence, stating "This is  
25 good and to the point which is maybe what they need right now."
- 26 • All government, media and expert sources were telling Victim/Witnesses', Bright  
27 Automotive, and Eco-Motors that they were about to receive their GOVT funding "any day  
28 now".

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- 1 • On, or about, early August of 2009, White House staff ordered Secretary of Energy Steven  
2 Chu not to fund Victim/Witnesses', Bright Automotive, and Eco-Motors because they could  
3 put Tesla Motors, The White House financier, out of business if they moved forward.
- 4 • On August 21, 2009, Lachlan W. Seward, Director, Advanced Technology Vehicles  
5 Manufacturing Incentive Program, wrote to Victim/Witnesses' informing Victim/Witnesses'  
6 that its ATVMIP application for a loan was rejected.
- 7 • Victim/Witnesses' claims Victim/Witnesses' Technology passed the tests for financial  
8 viability in its applications from 2008-2009.
- 9 • Victim/Witnesses' has patents and lists of assets. Tesla, by comparison, had 4,000 % higher  
10 debt than Victim/Witnesses' and Tesla was awarded loans by GOVT, while  
11 Victim/Witnesses' was not.
- 12 • Additionally, the NEPA for Victim/Witnesses' Vehicles had been reviewed, edited and  
13 approved by GOVT National Environmental Protection Act (NEPA) staff (Matthew  
14 McMillen) at the beginning of 2009
- 15 • Victim/Witnesses' alleges that it did not pay for a NEPA analysis. Matthew McMillen at  
16 GOVT both offered to help and did help Victim/Witnesses' with drafting its NEPA review  
17 material. He edited their drafts and did Victim/Witnesses' NEPA analysis. To see his edits,  
18 look in Drop-box file titled "Properties" under file named "McMillen edits." There are  
19 documents with the 'track changes' function showing his assistance with the NEPA review  
20 documents Victim/Witnesses' had to provide GOVT.
- 21 • On September 21, 2009, Victim/Witnesses' wrote to Secretary Steven Chu of the U.S.  
22 Department of Energy inquiring about the circumstances for Victim/Witnesses' non-  
23 selection for negotiation of a loan with a lengthy list of issues that investigators had  
24 uncovered which indicated corruption and cronyism.
- 25 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged no reasons were given for  
26 its rejection under the Advanced Technology Vehicles Manufacturing (ATVM) Program.
- 27 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged it was able to receive  
28 reasons for its rejection orally, only after several attempts at phoning the ATVM office.

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- In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged it has still not received the reasons in writing.
- Victim/Witnesses' alleges "After multiple demands reasons were finally given by phone call and letter but the reasons appeared to have nothing to do with our company and serves to demonstrate that review data was manipulated."
- In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged the reasons for its rejection were not applicable to its loan application and did not reflect what was included in its submission.
- In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that after several more attempts at receiving more clarification from the ATVM office, no one has been in further contact with it.
- In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged it has not been able to find out whether there will be another round of loans granted and how it can alter its loan application to increase its chances of success.
- In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that one of the reasons given for its rejection was that Victim/Witnesses' car does not use E85.
  - In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged its car uses no gasoline.
- In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged another reason provided by the GOVT for its rejection was that it was not making millions of cars.
  - Victim/Witnesses' alleged its marketing plan did not support that production volume nor did its requested funding levels but that Victim/Witnesses' was fully capable and able of producing millions of cars on scale up to market demand, request of GOVT or at any reasonable time in manufacturing flow.
- In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that GOVT stated that Victim/Witnesses' was not planning to sell cars to the government.
  - Victim/Witnesses' alleges this is false and that its application clearly stated that the core sales plan of the company is based on government fleet sales.

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- 1 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that GOVT asserted its  
2 factory cost estimates were too low because the metal body fabrication systems were not  
3 calculated high enough.
  - 4 o Victim/Witnesses' alleges its vehicles use no metal fabrication in their bodies.
- 5 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted questions  
6 to the GOVT ATVM staff the day after it received the rejection and had still not received  
7 any response.
  - 8 o These questions include: (1) GOVT reviewers never even talked to the founder,  
9 inventor, engineers, project leads or primary contractors. Victim/Witnesses' was told  
10 over and over again that everything in its application was good and that no additional  
11 information was needed. This is despite the fact that the reasons given for its  
12 rejection did not reflect the technology being used and therefore the ATVM  
13 reviewers did not understand Victim/Witnesses' concept and product.  
14 Victim/Witnesses' wrote, "Why was no one at Victim/Witnesses' Vehicles  
15 contacted?"; (2) After nearly a year of waiting, accompanied by writing, verbal and  
16 in-person proclamations that "everything was fine", "everything is on-track", "you  
17 appear to meet every criteria", etc. and after staff expended the majority of their  
18 personal funds based on these positive assertions, the application was suddenly and  
19 mysteriously rejected. Victim/Witnesses' wrote, "Why was staff at GOVT during the  
20 course of the year, positive about the outcome and never asked for additional  
21 information?"; (3) At the start of the application process Victim/Witnesses' was told  
22 that the review would be very interactive but there was almost no interaction with us  
23 while larger players, who applied later, were reviewed earlier, had extensive  
24 interaction and have already been awarded their funds. Victim/Witnesses' wrote,  
25 "Why was the interactivity process never used with us?"; (4) Rejection comments  
26 supplied by Chris Foster of GOVT and third party press seem to be unrelated to the  
27 business of the company and have no foundation in fact. Victim/Witnesses' wrote,  
28 "Why is that?"; (5) One of the main reasons the GOVT gave for the rejection was the



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fact that Victim/Witnesses' vehicles do not use E85 gasoline. Victim/Witnesses' wrote, "If that was true, why did Tesla & Nissan get approved funding? Their vehicles also do not use E85."; (6) While it is true that Victim/Witnesses' did not wish to use carcinogenic gasoline, at no point was E85 gasoline ever mentioned, discussed, commented on or requested. In fact the topic was particularly avoided by GOVT staff. Victim/Witnesses' wrote, "Why not?"; (7) Another rejection point was that Victim/Witnesses' was not planning to make enough cars. Victim/Witnesses' claims this is false. The company would like to build and sell more cars than any other car company. Victim/Witnesses' is fully willing to produce millions of vehicles if provided with the appropriate funding as it has quantified millions of fleet buyers for its vehicles. No GOVT entity ever asked Victim/Witnesses' to adjust, discuss or amend its numbers and Victim/Witnesses' was more than willing to adjust those numbers if anyone had even bothered to ask. Victim/Witnesses' wrote, "What is the validity of this comment by the reviewers based on?"; (8) Victim/Witnesses' provided more than \$100 million of asset collateral opportunity for a \$40 million loan request. This constitutes over twice the collateral of the value of the loan. Victim/Witnesses' wrote, "How is this not as secure of a structure as any of the other Victim/Witnessess?"; (9) Victim/Witnesses' was told that it was rejected because it was not planning to sell cars to the government. Victim/Witnesses' claims this is false. The core sales plan of the company is based on government and commercial fleet sales. Victim/Witnesses' wrote, "Why did your reviewers say this? Why did you think this?"; (10) Victim/Witnesses' was told that electric motors and batteries were considered by the reviewers to be too futuristic of a technology and not developed for commercial use even though they have been in use in over 40 industries for over 20 years, including by NASA. Victim/Witnesses' wrote, "What is the rationale for this argument?"; (11) Almost every other part of the Victim/Witnesses' car was to be purchased from existing commercial sources with multiple points of supply, so it is not possible to see how a reviewer might think the vehicle had any significant

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1 technical acquisition hurdles. Victim/Witnesses' wrote, "Why does GOVT assume  
2 that the following companies with whom we would be contracting could not perform  
3 the following responsibilities: (a). Deloitte & Touche to provide auditing and  
4 reporting of financial data. (b). Autodesk or Microsoft to deliver the process and  
5 design software. (c). NEC, Intel or the other leading electronics companies in the  
6 world to build our controllers. (d). Roush Automotive, one of the most successful  
7 automobile electronics groups in the world, to build the electronic module. (e). US  
8 National Lab system to solder a box together. (f). Over 100 other major supplier  
9 companies that have been building parts for the auto, aerospace and industry for  
10 decades to deliver the component parts for our vehicles."; (12) The primary purpose  
11 of this loan program, Victim/Witnesses' was told by its authors, was to develop  
12 advanced technology and further reduce American dependence on gasoline. The  
13 Victim/Witnesses' Vehicles car uses no gasoline and gets over 125 miles per battery  
14 charge. Victim/Witnesses' wrote, "How is this not a direct conflict with the precepts  
15 of the Section 136 law?"; (13) Victim/Witnesses' was also told that its factory cost  
16 was too low because the metal body fabrication systems were not calculated high  
17 enough but the reviewers apparently did not even pay attention to the fact that  
18 Victim/Witnesses' uses no metal fabrication in its body. Victim/Witnesses' wrote,  
19 "What was the rationale in making such an erroneous comment?"; (14) Reviewers  
20 also stated that the car was a "hydrogen car" which it is not. It is an electric car.  
21 Victim/Witnesses' wrote, "Why did they say that?"; (15) Victim/Witnesses' wrote,  
22 "In what ways were the following documents actually reviewed? Your office stated  
23 that they 'lost our documents' twice. Why?";

- 24 • Victim/Witnesses' alleges that applications that have already been approved, have had less  
25 plans or hard development data. These awardees also had the same three-year timeframe in  
26 their proposals, and one even went into 2013. We also find this contrary to the  
27 Administration's stated goal about electric vehicles. According to a GOVT spokesman, the  
28 Administration "shares the goal of ensuring that the program (ATVM) is flexible enough to

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1 account for the full range of available technologies.” In fact, when Tesla Motors received  
2 it’s GOVT cash it had no car design, just some pretty pictures. Nothing in the Tesla car in  
3 the showrooms was in a factory engineering drawing at the time Tesla got its GOVT funds.  
4 Tesla designed the entire car FROM SCRATCH, after it got the GOVT money. Anybody  
5 could have done that with 50% less money than Tesla spent doing it after the fact.

- 6 • Victim/Witnesses' alleges that the claim that the project’s impact on fuel economy of the US  
7 Light Duty Fleet over time was weak was never discussed with Victim/Witnesses's team at  
8 any point of the process. However, it is surprising to how a vehicle that is lighter than any  
9 other Victim/Witnesses by half, safer than any other Victim/Witnesses by many times and  
10 beats the metrics of every other Victim/Witnessess could not have exceeded every  
11 Victim/Witnesses on any comparison to Light Duty fleet metrics, a market that was core to  
12 Victim/Witnesses' business plan. Their fleet sales were targeted directly at the Light Duty  
13 fleet and the Pentagon so the GOVT excuse seems to be a lie by GOVT staff.
- 14 • The third reason cited in the letter was about the use of “advanced fuels.” First of all, at no  
15 point did anyone from GOVT ask about or discuss with Victim/Witnesses' technical staff  
16 their fuel plans. The letter further goes on to say that their use of hydrogen was one of the  
17 reasons that their application was being rejected. Even though GOVT knew that BMW,  
18 Toyota, Honda and Hyundai were in factory preparation with hydrogen fuel cell cars which  
19 are as common today as any other car. Hydrogen was non-essential to Victim/Witnesses'  
20 vehicle. The hydrogen tank was, rather, an optional and stand-by range-extender system for  
21 the electric vehicles. Further everyone of expertise fails to see how GOVT could state that  
22 hydrogen is an “impractical and unproven energy source” in light of the fact that Honda and  
23 BMW are already shipping cars using that fuel source and large numbers of main stream  
24 auto companies have announced production launch plans for 100% hydrogen fuel cell  
25 vehicles. To must reiterate: hydrogen was not an essential component of their vehicles and  
26 had GOVT asked Victim/Witnesses' about this fuel source, it ccould have explained that to  
27 them. It should be noted that most of the Obama and GOVT staff had invested their money  
28 in lithium ion battery mining in Afghanistan and lithium battery production. Thus they had a

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conflict-of-interest reason to harm fuel cell vehicle production.

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- Corrupt rare earth mineral mines were a large part of the scam.

The men who controlled the White House and The U.S. Government at this time are known as “The Silicon Valley Cartel”, AKA “The Paypal Mafia”, AKA “The Deep State”. They run Google, Facebook, Tesla and venture capital funds.

The entities involved as perpetrators in this case have violated a number of laws and ethical standards including: **The Mail Fraud Act** (1872); **The Tillman Act** (1907); **The Hatch Act** (1939); **The Hobbs Act** (1946); **The Taft- Hartley Act** (1947); RICO and Anti-trust laws; **The Federal Election Campaign Act** (1974); **The Federal Program Bribery Statute** (1984); **The Bipartisan Campaign Reform Act** (2002); and many other laws. They all use the same corrupt army of dirty lawyers, corrupt CPA’s, unethical lobbyists, character assassination services and covert ex-CIA operatives.

- Finally, the letter states that the Victim/Witnesses' Vehicles petroleum use reductions were unrealistic. The whole world is most confused about this point as Victim/Witnesses' car uses absolutely no gasoline. How could their reductions be “unrealistic”? Was that not a goal of the Obama Administration? ..or were GOVT staff just a bunch of “lying, deceitful, conniving, manipulative shills that will do anything to protect their friends and harm their competitors..” as other Victim/Witnesses’s stated.
- The company hired famous senior systems engineer to validate the final vehicle numbers submitted in the base response and provided numbers in support of that data produced by Sandia National Laboratories.
  - How could those entities have provided numbers which the ATVM office could have interpreted so negatively for a vehicle which weighs less, goes farther and requires less energy storage than any other submitted vehicle in the entire set of Victim/Witnessess to date?
  - How could the ATVM reviewers never even submit a question to the Victim/Witnesses' technical team about any of these metrics?
- In summation, these clarifying reasons for rejecting the Victim/Witnesses' Vehicles ATVM loan application are still confusing, not applicable in many cases and unwarranted when considering those applications that have been approved. The listed points appear to have no foundation in facts relative to our design and we again question why there was no

1 communication from GOVT with the developers of the vehicle over a year. Clearly, GOVT  
2 was running a “Slush-Fund” designed to ONLY pay political campaign financiers and shut  
3 down those financiers competitors.

- 4 • Further, Congressional investigators found that competing larger companies like Tesla were  
5 given much counseling, guidance, feedback and opportunity to “tweak” their applications by  
6 GOVT. These companies submitted their applications later than Victim/Witnesses' and were  
7 awarded funding. Our question is then why did Tesla lover Carol Battershell, GOVT Senior  
8 Advisor state during the December 1, 2008 Public Meeting that “And that might lead one to  
9 believe that applying earlier is better than apply later.” When the program was first  
10 announced, that indeed was the guidance given – first come, first served – so scores of  
11 smaller, electric car companies and suppliers submitted their applications. Yet the rules were  
12 changed mid-way through the process to allow larger automotive companies who did not  
13 submit their applications first to send them in and now they are being funded.
- 14 • Finally, Victim/Witnesses' were very disappointed to read in the September 23, 2009 issue  
15 of E&E News that Secretary Chu had suggested in June that the Administration was hoping  
16 that GM and Chrysler would be able to participate in the (ATVM) loan program. “There is  
17 money there, I wouldn’t say set aside, but let’s just say we are trying to stretch those dollars  
18 as far as we can.” This forces us to ask whether these funds are being set aside at the  
19 expense and loss of smaller, more advanced technology electric car companies and suppliers  
20 who are requesting billions less in guaranteed loans and who are offering more forward-  
21 thinking and advanced projects to help us move away from our dependence on oil.
- 22 • Tesla, Fisker & Nissan did not provide as much collateral offerings in their application, at  
23 the same time as Victim/Witnesses' application, and to date, may not have ever provided  
24 such collateral offers.
- 25 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
26 detailed, comprehensive 10-year, person-by-person financials that cost the company almost  
27 \$200,000.00 to prepare and that other companies spent more than \$200,000.00 to prepare;
- 28 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT

- 1 metrics that demonstrated that the Victim/Witnesses' car can save millions of lives per year  
2 and that it was safer than any vehicle;
- 3 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
4 metrics that demonstrate that a gasoline/hybrid vehicle is dangerously carcinogenic when  
5 filled at a gas station compared to an Victim/Witnesses' Vehicle; World Health Organization  
6 and leading medical and university studies have substantiated these facts.
  - 7 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
8 engineering and IP metrics that beat every competitor on price, range, safety, TOC,  
9 efficiency, toxic safety and hundreds of other points;
  - 10 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
11 examples of work from \$3M of cash and person-hours previously invested by founders,  
12 GOVT & partners;
  - 13 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
14 lists of top auto and aerospace corporate partners, staff and resources, on stand-by, equaling  
15 thousands of people in all groups combined;
  - 16 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
17 validation of a deep team of core staff that have been developing the project and parts of the  
18 project for 3-15 years part time;
  - 19 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
20 samples of extensive international positive press coverage;
  - 21 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
22 proof of a market opening timed with tax and national imperative incentives that created a  
23 dramatic window for success;
  - 24 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
25 proof that Victim/Witnesses' was the lowest overhead car company in the market which  
26 equates to the best chance to profit and return funds;
  - 27 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
28 samples of an in-house created online process management architecture; market and

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- 1 marketing studies; CAD designs, engineering plans and manufacturing plans; a detailed  
2 website; a detailed path to \$1.5B within 5 years or less from a less than \$100M investment;
- 3 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
4 examples of dozens of prototypes as seen in the photographs on the BUILDS page of its  
5 website;
  - 6 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
7 numerous patents;
  - 8 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
9 a large pending portfolio with third party valuation and validation reports valuing IP at over  
10 \$100M;
  - 11 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
12 information concerning senior scientists, chemists and engineers from top university and  
13 federal laboratories, including staff that has built and delivered millions of vehicles to the  
14 consumer market;
  - 15 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
16 information concerning its partners: Federal, University, Fortune 500, Private Research  
17 Organizations;
  - 18 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
19 written Customer inquiries from a massive national customer base of qualified retail leads  
20 and 1.2M of commercial unit opportunities equaling a \$1.5B+ opportunity.
  - 21 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
22 contracts: Federal Contract fully executed and MOU's executed;
  - 23 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
24 Awards/Commendations: Congress, DARPA;
  - 25 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
26 Research Data: Over 200+ technical research documents & 15+ years of research;
  - 27 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT  
28 evidence of over 22,000+ man hours of development;



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- 1 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT
- 2 market data;
- 3 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT
- 4 over 100+ documents of industry study;
- 5 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT
- 6 issued trademarks;
- 7 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT
- 8 information concerning its facilities;
- 9 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it provided to GOVT
- 10 unique access to Federal Labs & leased facility options;
- 11 • In the September 21, 2009 Chu Letter, Victim/Witnesses' alleged that it submitted to GOVT
- 12 other supporting materials.
- 13 • In the September 21, 2009 Chu Letter, Victim/Witnesses' asked for the opportunity to speak
- 14 with Secretary Chu in person to discuss its technology and how it can help our country.
- 15 • Victim/Witnesses' wrote, "I believe there was some confusion about our application and
- 16 vehicle technology that I would very much like to clear up with you in person."
- 17 • § 611.103 sets forth the evaluation criteria for ATVM loan Victim/Witnessess, outlining the
- 18 technical merit of the proposed advanced technology vehicles or qualifying components,
- 19 with greater weight given for factors including, but not limited to: Improved vehicle fuel
- 20 economy above that required for an advanced technology vehicle; Potential contributions to
- 21 improved fuel economy of the U.S. light-duty vehicle fleet; Likely reductions in petroleum
- 22 use by the U.S. light-duty fleet; and Promotion of use of advanced fuel (e.g., E85, ultra-low
- 23 sulfur diesel).
- 24 • Victim/Witnesses' alleges that Victim/Witnesses' data-sets beat the other Victim/Witnessess
- 25 on metrics, performance and value.
- 26 • Victim/Witnesses' alleges ATVM loan approvals lacked appropriate criteria. This is
- 27 confirmed by multiple GAO reports about corruption and failure to comply AGAINST
- 28 GOVT by the GAO.

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- 1 • Victim/Witnesses' alleges applications offered more collateral than any other
- 2 Victim/Witnesses or “winner”, more letters of support from waiting customers, a less
- 3 complex bill-of-materials, with a lower initial volume manufacturing cost, that re-opened
- 4 more closed factories than any other Victim/Witnesses or “winner” at the time of
- 5 submission.
- 6 • The substantive explanation for why Victim/Witnesses' merited the ATVM loan is that
- 7 Victim/Witnesses' was prepared to manufacture a cheaper version of the Nissan Leaf. As of
- 8 Dec. 28, 2008 Victim/Witnesses' had a design more finished and ready than Tesla, Fisker
- 9 and Nissan. Victim/Witnesses' model was almost exactly the same as the Nissan Leaf.
- 10 • Victim/Witnesses' claims GOVT staff synthetically manipulated Victim/Witnesses' results to
- 11 be low in order to favor others.
- 12 • Victim/Witnesses' alleges that Victim/Witnesses' application process was sabotaged, inside
- 13 and outside, in order to benefit competing interests and disfavor smaller, independent
- 14 companies who applied.
- 15 • Victim/Witnesses' alleges GOVT officials ordered reviewers of funding applications to
- 16 change their review criteria, part way through the process, in order to favor certain
- 17 Victim/Witnessess or “winners”.
- 18 o Many of those Victim/Witnessess would have qualified at the bottom of a proper
- 19 review in an unbiased review.
- 20 o GOVT paid outside reviewers for work in the review process under a variety of
- 21 names, and the work performed, by a company with little experience in the industries
- 22 it was to review, was produced per GOVT officials specifications rather than per the
- 23 metrics of the actual facts.
- 24 o Staff from national labs have stated to reporters that they were directed to manipulate
- 25 data.
- 26 o Victim/Witnesses' staff have seen “shoot-out” unofficial, internal, confidential,
- 27 GOVT Excel comparison matrices as of Dec. 29, 2008 and March 2, 2009 and
- 28 Victim/Witnesses' placed in the top 5% in over-all comparison metrics.

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- 1 • Victim/Witnesses' application was first-in-line (which is how the law said applications were  
2 to be processed) yet GOVT staff changed/violated the law in order to cut Victim/Witnesses',  
3 and other Victim/Witnessess, out and favor "special Victim/Witnessess" who didn't apply  
4 properly because they knew they had the money "hard-wired" already.
- 5 • Victim/Witnesses' alleges GOVT officials changed the first-come-first-served published rules  
6 and standards of the funding in order to take Victim/Witnessess in order of who they favored  
7 and who had purchased the most influence instead of the order in which they applied, as  
8 required.
- 9 • Victim/Witnesses' alleges GOVT officials were ordered by GOVT senior executives and  
10 outside public office executive staff to not respond to non-favored Victim/Witnessess until  
11 certain application deadlines had passed in order to remove the non-favored, non-influence  
12 purchasing Victim/Witnessess from potential funding.
- 13 • Victim/Witnesses' alleges "GOVT officials personally assisted and hand-held  
14 Victim/Witnesses' competitor's Victim/Witnessess including site meetings in which they  
15 drafted the Victim/Witnessess applications while ignoring competing Victim/Witnessess to  
16 those favored Victim/Witnessess."
- 17 • Victim/Witnesses' alleges Victim/Witnesses' spoke to Carol Battershel, who stated she was  
18 the due diligence technical lead, who said she had gotten everything she needed "off our  
19 website". Battershel was later revealed to be an ad hoc advocate for Tesla Motors.
- 20 • Victim/Witnesses' alleges "GOVT reviewers never even talked to the founder, inventor,  
21 engineers, project leads or primary contractors."; "GOVT never even contacted our  
22 engineers and refused to speak to them even once, although our engineers called them and  
23 visited them to see if they could provide any data because they were so surprised that  
24 nobody from GOVT ever called them."
- 25 • Victim/Witnesses' alleges Victim/Witnesses' was told that everything in their application  
26 was good and that no additional information was needed.
- 27 • Victim/Witnesses' alleges "reviewers at national labs were ordered to change data, or their  
28 data was changed."

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- 1 • Victim/Witnesses' alleges "standard commercial bank loan processes were not used for each
- 2 Victim/Witnesses."
- 3 • Victim/Witnesses' alleges "Commercial bank officers will testify that all banks process the
- 4 same loan applications for the same commercial manufacturing purposes in an average 18
- 5 days and not in timeframes measured in years. The 'Loan review process' was intentionally
- 6 stalled to keep competitors from competing with the 'winners'."
- 7 • Victim/Witnesses' alleges "The original distribution date for the funds was set to be Dec.
- 8 08/Jan. 09. Victim/Witnesses' suffered damages because of multiple date manipulations."
- 9 • Victim/Witnesses' alleges "Victim/Witnesses' and other Victim/Witnessess were given
- 10 different hoops to jump through in order to go through the application process depending on
- 11 whether or not they had purchased influence or not."
- 12 • Victim/Witnesses' alleges "The process was different for favored Victim/Witnessess vs.
- 13 unfavored Victim/Witnessess."
- 14 • Victim/Witnesses' alleges "GOVT staff told multiple independent car company
- 15 Victim/Witnessess that the fund was out of money and that, that was one of the reasons that
- 16 those Victim/Witnessess could not move forward. At no time was the fund out of money
- 17 and, indeed, a 'carve out' of money was 'held out' for Detroit. GOVT gave favored, limited,
- 18 small cluster 'carve out' Victim/Witnessess top-tier status for consideration based on
- 19 'special relationships.'"
- 20 • Victim/Witnesses' "Leaf's" would have sold more volume at a higher mark-up than
- 21 Nissan's Leaf's because Victim/Witnesses' metrics already exceeded what the customers
- 22 already demanded so Victim/Witnesses' would have had an even higher profit number, by
- 23 now, than the \$205,000,000.00.
- 24 70 GOVT stated that they "lost our documents" twice. This seemed to Victim/Witnesses' like a
- 25 "Lois Lerner" tactic.
- 26 • On October 23, 2009, Lachlan W. Seward, Director, Advanced Technology Vehicles
- 27 Manufacturing Incentive Program, wrote to Victim/Witnesses' informing them that critical
- 28 issues were identified in its application.

- 1           o Victim/Witnesses' disputed these critical issues.
- 2           • Victim/Witnesses' alleges that after months of reassurance from certain GOVT staff that
- 3           Victim/Witnesses' application was “substantially complete,” the application was denied
- 4           without explanation in August 2009.
- 5           • Victim/Witnesses' alleges that the GOVT ATVM Director, Lachlan Seward, was improperly
- 6           influenced to fund Detroit-based “Big Three” projects as well as the politically well-
- 7           connected Tesla, contrary to the letter and spirit of the loan-enabling legislation. White
- 8           House car czar: Steve Rattner confirmed this.
- 9           • In addition, Victim/Witnesses' believes that Seward improperly discriminated against their
- 10          company’s application after the Company questioned the logic of one of the LGP’s policies
- 11          in a public hearing and subsequently requested a review of the GOVT application process by
- 12          Senator Bingaman, Chairman of the Senate Energy and Natural Resources Committee.
- 13          • Victim/Witnesses' alleges in its first meeting with the senior officers of the GOVT program
- 14          and the auto industry at GOVT HQ (which was videotaped by GOVT) Victim/Witnesses'
- 15          senior staff asked Lachlan Seward a question about the logic of one of his policies after he
- 16          had been contradicted by his staff on the stage. It was later reported to Victim/Witnesses'
- 17          that, after the meeting, Mr. Seward said within earshot of his staff something to the effect of
- 18          “it will be a cold day in hell before I let them get any of this money”.
- 19          • Victim/Witnesses' filed four different complaints on Mr. Seward’s office with the Senate
- 20          Committee in charge of GOVT under Sen. Bingaman.
- 21          • The misrepresentations and the special treatments of competitors cost the company massive
- 22          losses in competitive positioning, ramp-up costs based on assertions of favorable loan status,
- 23          and other damages.
- 24          • Victim/Witnesses' alleges that the U.S. GOVT has failed to reform the application selection
- 25          process based on recommendation provided in report GAO-10-627 by The U.S. Government
- 26          Accountability Office in July 2010.
- 27          • Victim/Witnesses' alleges it used the same power plant as Victim/Witnessess Nissan and
- 28          Tesla.

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- 1 • On October 29, 2009, Rebecca M Makar, of The U.S. Government Accountability Office,  
2 reached out to Victim/Witnesses' concerning Victim/Witnesses' ATVM application.
- 3 • On November 3, 2009, Ms. Makar wrote to Victim/Witnesses' to schedule an interview with  
4 Victim/Witnesses' concerning Victim/Witnesses' experiences with the Department of  
5 Energy's ATVM program.
- 6 • The application was again deemed substantially complete on November 10, 2009.
- 7 • Upon information and belief, on November 10, 2009, Victim/Witnesses' completed stage  
8 one of the review process.
- 9 • On June 9, 2011, Frank Rusco, Director of Natural Resources and Environment at GAO,  
10 provided testimony before the U.S. Senate Committee on Energy and Natural Resources,  
11 Report No. GAO-11-745T, titled "Advanced Technology Vehicle Loan Program Needs  
12 Enhanced Oversight and Performance Measures," in which GAO stated, "[t]he ATVM  
13 program has set procedures for overseeing the financial and technical performance of  
14 borrowers and has begun oversight, but at the time of our February report it had not yet  
15 engaged engineering expertise needed for technical oversight as called for by its procedures.  
16 . . . However, the program had not yet engaged such expertise. As a result, GOVT cannot be  
17 adequately assured that the projects will be delivered as agreed."
- 18 • Victim/Witnesses' alleges GOVT has failed to address the 2011 GAO report on the ATVM  
19 loan program recommended objective technical and financial criteria to measure program  
20 performance.
- 21 • The June 9, 2011 testimony also stated, "GOVT has not developed sufficient performance  
22 measures that would enable it to fully assess progress toward achieving its three program  
23 goals."
- 24 • Victim/Witnesses' alleges that Patent filed May 21, 2004 and granted October 9, 2007 for a  
25 Solid-State Hydrogen Storage System was infringed due to untoward conduct by the U.S.  
26 Department of Energy.
- 27 • Victim/Witnesses' alleges that Patent filed August 6, 2008 and granted October 30, 2012 for  
28 an Inflatable Electric and Hybrid Vehicle System was infringed due to untoward conduct by

1 the U.S. Department of Energy.

- 2 • There is some evidence that GOVT shared sensitive scientific information that  
3 Victim/Witnesses' provided GOVT with Victim/Witnesses' competitors. For example,  
4 Victim/Witnesses' visited the Argonne National Laboratory in California and learned that  
5 GM obtained sensitive, patented information about some of Victim/Witnesses' technology.  
6 With it, GM built a duplicate of Victim/Witnesses' energy-saver device.
- 7 • On May 3, 2005 The U.S. Congress in H2866 in the Congressional Record as part of the  
8 “Iraq War Bill” commended the Victim/Witnesses' project and directed the GOVT to award  
9 them funding. The U.S. Congress supported the project in the “Iraq War Bill” because of the  
10 teams technology which can reduce U.S. dependence on foreign oil as a value to U.S.  
11 security.
- 12 • In its application under the ATVM program, Victim/Witnesses' stated “Exhibit D provides a  
13 copy of Victim/Witnesses' Vehicles Business Plan, which is extremely confidential!”
- 14 • On March 29, 2009, Victim/Witnesses' counsel wrote to Jason Gerbsman, the Director of  
15 External Affairs at the GOVT, requesting confidential treatment under 10 C.F.R. §§1004.11  
16 and 1004.10(b)(4) as well as under 5 U.S.C. §552(b)(4).
- 17 • In September 2005, Victim/Witnesses' received a grant from The U.S. Government for a  
18 project with end date of 8/31/2006. In an e-mail dated March 5, 2002 from Scott Vaupen at  
19 Sandia National Laboratories to Victim/Witnesses', Mr. Vaupen wrote, concerning hydrogen  
20 storage via Fuel Cell, “If you are interested in licensing technologies, please let me know  
21 exactly what areas you are interested in and I can try to sort out what technologies we have  
22 available.”
- 23 • In Victim/Witnesses' November 12, 2008 ATVM Loan application, subcontractors were  
24 identified as Victim/Witnesses' and Sandia National Laboratories.
- 25 • Victim/Witnesses' alleges there is evidence that GOVT shared sensitive scientific  
26 information that Victim/Witnesses' provided GOVT with Victim/Witnesses' competitors.  
27 Victim/Witnesses' visited Sandia National Laboratories and communicated, via phone and e-  
28 mail, with the Argonne National Laboratory and learned that GM obtained sensitive,

1 patented information about some of Victim/Witnesses' technology. With it, GM built a  
2 duplicate of Victim/Witnesses' energy-saver device. The "sensitive scientific information"  
3 was submitted to GOVT by Victim/Witnesses' as part of its ATVM loan application, which  
4 was protected by confidentiality. This scientific information included fuel cell and hydrogen  
5 storage technologies, fuel cassettes and pressure membrane body parts,

- 6 • Victim/Witnesses' was invited to The U.S. Government Sandia National Laboratories and  
7 was given a facility tour. In one room where large glove-boxes and chemical testing  
8 equipment was used, he saw a table with a presentation set-up for another group. On that  
9 table were duplicates of the technology he had filed patents on, built, tested and received  
10 issued patents on and signage on the devices stated: "General Motors hydrogen vehicle  
11 production system" and "NALH General Motors Reversible Hydrogen Vehicle Energy  
12 System built by General Motors and Sandia" NALH is one of the exact chemistries, of over  
13 2800+ possible chemistries that might be used, that Victim/Witnesses' has an issued patent  
14 on. Victim/Witnesses' pointed this out to Chris Moen and Daniel Dedrick, senior scientists at  
15 Sandia, who stated that they were concerned that there might be "a problem with that" and  
16 said that we "might want to contact GM to seek to make a "partnership" so there was no  
17 acrimony. On December 12, 2008, a nondisclosure agreement was made and entered into  
18 between Palintiff and Sandia National Laboratories.
- 19 • On or about Jan. 15, 2012, Victim/Witnesses' became aware of internet stories about GM  
20 productizing alanates solid state hydrogen storage for its fuel cell cars via Sandia and  
21 Argonne National Labs
- 22 • On or about March 12, 2012 Victim/Witnesses' became aware of articles about Ford Motors,  
23 Inc., planning to ship inflatable seats, seat belts and inflatable body parts.
- 24 • Victim/Witnesses' alleges potential patent infringement
  - 25 o Currently a number of companies (over 30) are selling Victim/Witnesses' exact
  - 26 patented technology without paying for it.
  - 27 o This is the exact technology Victim/Witnesses' designed, proposed, patented and
  - 28 won acclaim for.



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- o Some of them were enabled by GOVT funding. Some of them were hired as “reviewers” for Victim/Witnesses' applications, by GOVT.
- o Hard evidence has been provided to Victim/Witnesses' demonstrating that these parties infringed Victim/Witnesses' patents during this period.
- o At least two companies acquired Victim/Witnesses' technical data through the programs and then marketed that technology as their own, infringing Victim/Witnessess existing, issued, patents.
- Victim/Witnesses' included, as Appendix A, in its loan application, its issued energy industry patents and their estimated value valued by outside third party patent analysts. This included a U.S. Patent with an estimated value of \$104,072,538.36; A U.S. Patent with an estimated value of \$17,291,568.64; A U.S. Patent with an estimated value of \$10,524,792.26; and a U.S. Patent with an estimated value of \$5,607,695.94. The total estimated value of these patents is \$137,496,595.20.
- A U.S. Department of Energy Press Release from Thursday, November 6, 2008, titled “Fact Sheet: Advanced Technology Vehicles Manufacturing Loan Program” stated “The FY 09 Continuing Resolution authorized up to \$25 billion in direct loans to eligible Victim/Witnessess for the costs of reequipping, expanding, and establishing manufacturing facilities in the U.S. to produce advanced technology vehicles, and components for such vehicles.”
- In the Fact Sheet, GOVT explained that Congress set forth the criteria for projects and costs eligible to receive direct loans. “The key criteria for qualified advanced technology vehicles or qualified components require: Manufacturing facilities be located in the U.S.; Engineering integration be performed in the U.S.; Costs be reasonably related to the reequipping, expending, or establishing a manufacturing facility in the U.S.; and Costs of engineering integration be performed in the U.S.”
- The Interim Final Rule, 10 C.F.R. Part 611, Advanced Technology Vehicles Manufacturing Incentive Program, clarifies that: “Section 136 provides two categories of projects eligible for direct loans: (1) manufacturing facilities in the United States designed to produce

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- 1 qualified advanced technology vehicles or qualified components; and (2) engineering  
2 integration performed in the United States of qualifying advanced technology vehicles  
3 and qualifying components. Eligible costs of such projects are: (a) those costs that are  
4 reasonably related to the reequipping, expanding, or establishing a manufacturing facility  
5 in the United States to produce qualifying advanced technology vehicles or qualifying  
6 components; (b) costs of engineering integration performed in the United States for  
7 qualifying vehicles or qualifying components. Costs eligible for payment with loan  
8 proceeds are costs incurred, but not yet paid by the borrower, after a substantially  
9 complete application has been submitted to GOVT and costs incurred after the closing of  
10 the loan.
- 11 • Section 136 of the Energy Independence and Security Act of 2007 (“EISA”) authorizes the  
12 Secretary of Energy to “make grants and direct loans to eligible Victim/Witnessess for  
13 projects that reequip, expand, or establish manufacturing facilities in the United States to  
14 produce qualified advanced technology vehicles, or qualifying components and also for  
15 engineering integration costs associated with such projects.”
  - 16 • Victim/Witnesses' interpreted EISA, together with the Interim Final Rule, to authorize  
17 federal funds to support U.S. production of qualifying components.
  - 18 • GOVT gave Tesla Motors, Inc. a \$465 million loan under the ATVM program. According  
19 to a U.S. Department of Homeland Security, Immigration and Customs Enforcement report  
20 dated December 22, 2011, the GOVT loan to Tesla was to “(1) Reopen an auto  
21 manufacturing plan in Fremont, California to produce specially-designed, all-electric, plug-  
22 in vehicles and (2) to develop a manufacturing facility to produce battery packs, electric  
23 motors and other powertrain components that will power all-electric plug-in vehicles  
24 manufacturing by Tesla[.]”
  - 25 • According to the ICE Report, DHS ICE investigated whether Tesla Motors used foreign  
26 made parts in manufacturing their vehicles.
  - 27 • According to a July 15, 2009 article in Venture Beat, Tesla Motors “recent recipient of \$465  
28 million in low-cost federal loans via the U.S. Department of Energy’s Advanced

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1 Technology Vehicles Manufacturing program, won't have to raise new matching funds to  
2 qualify like other recipients."

- 3 • If so, Victim/Witnesses' believe Tesla violated the requirements of both the Interim Final  
4 Rule and EISA.

5  
6 LGP

- 7 • In early February 2009, Victim/Witnesses' was informed by House Speaker Pelosi's office  
8 that the Loan Guarantee program existed and that the company appeared to meet the criteria  
9 for a successful application. The company emailed the GOVT program office stating their  
10 intent to apply for a loan. However, after some additional research, it appeared that the  
11 application fees were prohibitive.

- 12 • Victim/Witnesses' Vehicles company officials were then invited to attend, via webcam, a  
13 Senate Energy Committee hearing chaired by Sen. Jeff Bingaman (D-NM) in which  
14 dramatic changes and repairs to the program were discussed, including waiving the fees.  
15 Also during the hearing, the loan program office was admonished for problematic  
16 management and fees, as well as the fact that the process was structured in an exclusionary  
17 manner.

- 18 • The company was then invited to a conference call with John Podesta, GOVT Secretary  
19 Steven Chu and Interior Secretary Ken Salazar during which Mr. Chu stated his intention to  
20 waive the application fees. Victim/Witnesses' Vehicles then submitted their application with  
21 a cover letter stating that they understood that Mr. Chu was waiving the application fees.

- 22 • Company officials then received a call on February 26, 2009 from Myrtle Gross from  
23 GOVT stating that they still needed to pay the fees and that funds needed to be wired by  
24 midnight February 26, 2009 in order for the loan application to be submitted.

25 Victim/Witnesses' Vehicles contacted several investors, but considering the extremely short  
26 notice could not complete the transaction with less than 12 hours' notice.

- 27 • Victim/Witnesses' was in part obstructed in its attempt to procure a Loan Guarantee by the  
28 actions of another senior GOVT official, Scott Tobin, who refused to respond to

- 1 Victim/Witnesses' requests for instructions on where and how to pay the fees to have the  
2 loan disbursed.
- 3 • Therefore, on February 27, 2009 the company assumed they had missed the deadline, but  
4 then they received a call from another GOVT official (Mr. Dan Tobin) stating that there  
5 were a few days of flexibility to send the application fees so the company re-contacted its  
6 investors. Mr. Tobin promised to get back to the company about where to wire the money.  
7 Funding was lined up but no information could be obtained about where to send it. More  
8 than six phone calls were placed by the Victim/Witnesses' and associates, along with scores  
9 of others from other company associates, to GOVT but these were never returned.
  - 10 • The GOVT refused to respond to Victim/Witnesses' request for review and explanation of  
11 the denial of their application, as well as numerous FOIA requests.
  - 12 • The GAO undertook a review of GOVT's application policies (in response to  
13 Victim/Witnesses' complaints, among other things), and recently issued findings that (1)  
14 GOVT's implementation of the LGP has treated Victim/Witnessess inconsistently, favoring  
15 some and disadvantaging others; and that (2) GOVT lacks systematic mechanisms for LGP  
16 Victim/Witnessess to administratively appeal its decisions or to provide feedback to GOVT  
17 on its process for issuing loan guarantees. Instead, the GAO found, GOVT re-reviews  
18 rejected applications on an ad hoc basis. The GAO report issued specific recommendations  
19 that GOVT take steps to ameliorate these failings.
  - 20 • Daniel C. Tobin, Senior Investment Officer of the GOVT Loan Guarantee Program Office  
21 stated that he (Mr. Tobin) would pre-review Victim/Witnesses' application and call back in  
22 order to provide feedback so investors could be informed in order for them to wire the  
23 money for the application fee.
  - 24 • Victim/Witnesses' alleges that after numerous calls and letters the GOVT response was not  
25 the pre-review communication that had been promised by Daniel Tobin, even though  
26 Victim/Witnesses' application had been received on time, but a dismissal from the program  
27 without recourse.
  - 28 • Victim/Witnesses' had a conference call with Secy. Chu who said he'd get the fees waived.

- 1 The company was then invited to a conference call with John Podesta, GOVT Secretary  
2 Steven Chu and Interior Secretary Ken Salazar during which Mr. Chu stated his intention to  
3 waive the application fees. Victim/Witnesses' Vehicles then submitted their application with  
4 a cover letter stating that they understood that Mr. Chu was waiving the application fees.
- 5 • On April 9, 2009, Dan Tobin of the GOVT wrote to Victim/Witnesses' (lead investor in  
6 Victim/Witnesses' Technology), that “due to non-remittance of the required application fee,  
7 your application will not be reviewed.”
  - 8 • This cost Victim/Witnesses' its funding opportunity and the associated revenue from such an  
9 opportunity.
  - 10 • Victim/Witnesses' demanded to Sen. Bingaman that it be re-entered into the Loan Guarantee  
11 Program or receive offset consideration in some other funding opportunity based on this  
12 situation.
  - 13 • GOVT’s response completely ignored the Tobin assertion. In other words, Tobin refused to  
14 act on his promise until the day after the deadline had passed and then sent a “you are  
15 rejected because you missed the deadline” email even though we had the money he wanted  
16 ready to wire to him on a moment’s notice. Victim/Witnesses' application was then rejected  
17 even though it had the highest metrics. Victim/Witnesses' staff were subjected to punitive  
18 and retribution action by GOVT staff, and their associates, for “whistle-blowing”.
  - 19 • Victim/Witnesses' alleges that investigators have provided Victim/Witnesses' with hard  
20 evidence of GOVT staff requiring subordinates to break the law and circumvent federal  
21 contracting, procedural and standard operating directives regarding communication  
22 protocols, documentation and file storage in order to obscure transparency and process and  
23 avoid revelation of their true activities.
  - 24 • Victim/Witnesses' claims, “One Senate investigation was stone-walled for a historically long  
25 period of time because GOVT staff intentionally hid, obscured and sought to destroy  
26 requested evidence.”  
27

#### 28 **Recent Results Of Federal And Private Investigations**

1 Since this matter began, FBI, SEC and Congressional investigations have revealed much.  
2 The latest revelations are:

3 - CROOKED POLITICAL INSIDERS have learned that when a government funded tech  
4 company fails, THOSE INSIDERS make billions of dollars in unjust profits from tax write-offs,  
5 Goldman Sachs services "fees" and stock market pump-and-dump manipulations while taxpayers  
6 lose BILLIONS on those same companies at Solyndra, Abound, Ener1, etc..... THAT'S RIGHT,  
7 the crooks make profits off of PLANNED-TO-FAIL taxpayer funded companies, many of which  
8 never even sold anything. It happened in the 2008 pretend "stimulus" and it is happening again,  
9 many times more, in the 2021 pretend "stimulus". The Cleantech companies were made-to-fail, as  
10 stock scams, by the insiders! Insider friend's at the Dept of Energy get to "jump-the-line", exploit  
11 the cash and Trojan horse the tech start-up into oblivion.

12 As with nearly a thousand Silicon Valley tech dirty money deals, for example, Netflix tech  
13 bosses are now getting caught selling media influence in exchange for bribes! Michael Kail  
14 (Netflix IT Boss), and other Netflix executives are under investigation for manipulating which  
15 media technologies get to make money. Netflix funds the DNC political campaigns. Netflix board  
16 positions and media slots are often traded as political quid pro quo payola for political favors.

17  
18 'Not only did Mr. Kail deprive Netflix of its money and resources by abusing his position as VP of  
19 IT Operations,' FBI Special Agent in Charge Craig D. Fair said in a statement, 'he created a pay-to-  
20 play environment whereby he stole the opportunity to work with an industry pioneer from honest,  
21 hardworking Silicon Valley companies.' The San Francisco FBI and the United States Patent Office  
22 has been asked, by independent video-on-demand inventors, to look at how Netflix, YouTube and  
23 other tech oligarchs, steal technologies and censor media access in a coordinated anti-trust violating  
24 scheme.

25  
26 Kail was indicted in 2018 on 19 counts of wire fraud, three counts of mail fraud, and seven counts  
27 of money laundering. The trial began April 19 in federal court in San Jose, California. The jury  
28 found him guilty on 28 of the 29 counts. Prosecutors said that Kail had accepted more than

1 \$500,000 in kickbacks - as well as valuable stock options - in exchange for approving millions of  
2 dollars in contracts for nine tech companies seeking to do business with Netflix between February  
3 2012 and July 2014.

4  
5 In a statement, the the Department of Justice said: 'He used his kickback payments to pay personal  
6 expenses and to buy a home in Los Gatos, California in the name of a family trust.' The Mercury  
7 News reports he must now forfeit his \$2.6 million three-bedroom, two-bathroom Los Gatos home to  
8 the federal government. Kail created and controlled a limited liability company, Unix Mercenary  
9 LLC, to receive the bribes, fund personal expenses and buy a home in Los Gatos, California,  
10 prosecutors said. This kind of case is typical of the **MAJORITY** of Silicon Valley tech executives.

11 Netflix, Google, and their *Silicon Valley Cartel*, operate secret programs that use data from  
12 personal and business records to manipulate business, politics and ideologies. For example, in the  
13 company's digital advertising exchange, Google manipulates it's ad-buying system, it's political  
14 marketing and it's executives ideology promotions to gain a dramatic advantage over competitors,  
15 according to court documents and federal records revealed in new antitrust lawsuits by various  
16 Attorney General's. Elon Musk is a mobster yet he used public funds to buy a facade of self-  
17 aggrandizement at the expense of the taxpayers.

18  
19 One corrupt secret Google program, known as "Project Bernanke," wasn't disclosed to publishers  
20 who sold ads through Google's ad-buying systems. It generated hundreds of millions of dollars in  
21 revenue for the company annually, the documents show. Google and Youtube, a unit of Alphabet  
22 Inc., always gets an unfair competitive advantage over rivals in business, politics, stock market  
23 valuations. In another corrupt program, Google invested in Tesla Motors, hyped Tesla and Musk  
24 and attacked Musk's competitors using nearly a hundred million dollars of equivalent competitor  
25 attack marketing. We are some of the Victim/Witnesses' of those attacks.

26 "...Over **540 pages** including a key set of **four pages** of documents from the office of the  
27 Secretary of State of California reveal how state officials employ Silicon Valley media companies  
28 (Twitter, Facebook, Google (YouTube)) to censor posts about politics. Included in these documents

1 were "misinformation briefings" emails that were compiled by communications firm SKDK,  
2 that **lists** Biden for President as their **top client**. The documents show how California state agencies  
3 successfully pressured YouTube to censor videos concerning things that **California political Cartel**  
4 **bosses like Harris, Pelosi and Feinstein** don't want citizens to see. A **December 2020**  
5 **report** surfaced that shows that the State of California is surveilling, tracking, and seeking to censor  
6 the speech of Americans in order to cover-up the political crimes and stock market manipulations  
7 that State officials are engaged in. California politicians own portions of Twitter, Facebook,  
8 Google (YouTube), LinkedIn, etc. and those social media companies are simply an arm of their  
9 political and stock market manipulation efforts..."



## EXHIBIT 59 - The Scams At The Secretary Of Energy's Office

**Energy Secretary Steven Chu** and his staff held stock and business partnerships in Tesla Motors and the rare earth companies used to make his batteries. The Energy Department has lied about their massive conflicts of interest, covered up hundreds of crony insider manipulations of applications and run Lois Lerner-type reprisal attacks on those who compete with Tesla and their crony buddies. In an exact repeat of the 2008 Solyndra "Stimulus" scam: **Energy Secretary Jennifer Granholm** owns up to \$5 million in the electric battery and vehicle manufacturer President Joe Biden will promote on Tuesday as part of his push for a \$1.9 trillion infrastructure bill. Biden's virtual visit to the electric battery producer Proterra comes days after Vice President Kamala Harris paid a visit to Thomas Built Buses, a North Carolina-based school bus company that counts Proterra as its main supplier of electric vehicles. The back-to-back White House visits to Granholm-connected companies risk at least the appearance of impropriety and demonstrate how lawmakers can use policy initiatives to pad their own wallets.

America can no longer give out taxpayer cash based on who the best friends of crooked Senators are!

10	Proterra, Inc., vested stock options	N/A	\$1,000,001 - \$5,000,000	None (or less than \$201)
11	Proterra, Inc., stock options (value not readily ascertainable): 38,542 unvested shares, strike price \$5.35, vest 12/2021, exp. 12/2024	N/A		None (or less than \$201)
12	Proterra, Inc., stock options (value not readily ascertainable): 22,500 unvested shares, strike price \$4.26, vest 12/2021, exp. 12.2024	N/A		None (or less than \$201)

Granholm has taken a leading role in the administration's forthcoming infrastructure package. The president in February tasked her with "identifying risks in the supply chain for high-capacity batteries, including electric-vehicle batteries, and policy recommendations to address these risks." The U.S. Government did not respond to multiple requests for comment.

Granholm joined Proterra's board of directors in March 2017; internet archives list her as a board member as recently as February 19, 2021, shortly before her confirmation on February 25. Her financial disclosures reveal up to \$5 million worth of stock options in the green tech company,

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1 which went public in January through the special purpose acquisition company ArcLight Clean  
2 Transition Corp. Arclight, a NASDAQ-listed company, saw shares shoot up about [55 percent](#) since  
3 its September IPO, a spike financial traders attributed directly to the acquisition of Proterra.

4  
5 In a January 16 letter to the designated agency ethics official, Granholm vowed to step down  
6 from the board and sell her stock in the company, as well as the steps she will take "to avoid any  
7 actual or apparent conflict of interest." The former Michigan governor has sold some stock, but has  
8 not offloaded any of her Proterra shares, according to a White House official. Granholm's stake in  
9 Proterra represents her largest financial asset outside of a house in Oakland, Calif., that she values  
10 as between \$1 and 5 million, according to her financial disclosures. The White House confirmed  
11 that Granholm still holds stock in Proterra, but said she played no role in planning the president's  
12 visit. Proterra was selected for today's virtual visit because it is the leading U.S. manufacturer of  
13 electric buses, employing 600 workers at its South Carolina and California plants," a White House  
14 official told the Washington Free Beacon. "Neither Secretary Granholm nor The U.S. Government  
15 were involved in selecting the Proterra plant."

16  
17 In a February 24 executive order, Biden placed Granholm in charge of "identifying risks in the  
18 supply chain for high-capacity batteries, including electric-vehicle batteries, and policy  
19 recommendations to address these risks." One of Proterra's key products is electric-vehicle  
20 batteries. Proterra's website boasts that "our flexible design enables Proterra® EV batteries to be the  
21 best choice for commercial vehicles ranging from transit buses and trucks to delivery vehicles,  
22 construction equipment, and more." Nearly 85 percent of Proterra employee campaign contributions  
23 went to Democrats, including Joe Biden, according to the Center for Responsive Politics. "You can't  
24 win", but that's all part of the politicians crooked plan. These crimes involve well-known public  
25 officials and pervert Silicon Valley billionaires who are trying to cover these crimes up. We won't  
26 let them get away with this corruption, though! Here is over a million pages of evidence and hours  
27 of video against them! Nicholas and Joby Pritzker—members of Illinois Democratic governor J.B.  
28 Pritzker's megadonor family—own nearly 12 million shares of ArcLight through their venture

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1 capital fund, Tao Capital. ArcLight in January announced a \$1.6 billion merger with Proterra, which  
2 will see the electric vehicle manufacturer go public in 2021. Granholm served on Proterra's board  
3 for nearly four years and still holds up to \$5 million in company stock.

4  
5 National Economic Council director Brian Deese is also tied to Proterra through BlackRock, the  
6 investment giant where he worked as global head of sustainable investing before joining the Biden  
7 administration. BlackRock is one of several investment firms that pumped a combined \$415 million  
8 into the Proterra merger, and Deese reported holding more than \$2.4 million in BlackRock vested  
9 restricted stock in his February financial disclosure. These investors are posed for steep gains, as  
10 ArcLight's stock price has surged 50 percent—from \$11.90 to \$18 per share—since January.

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Name and Address of Beneficial Owners <sup>(1)</sup>	Prior to Business Combination <sup>(2)</sup>		After Business Combination			
			Assuming No Redemptions <sup>(3)</sup>		Assuming Maximum Redemptions <sup>(4)</sup>	
	Number of Shares	%	Number of Shares	%	Number of Shares	%
<i>Directors and officers prior to the Business Combination:</i>						
Arno Harris <sup>(5)</sup>	35,000	*	35,000	*	35,000	*
Brian Goncher	35,000	*	35,000	*	35,000	*
Christine M. Miller	—	—	—	—	—	—
Daniel R. Revers <sup>(6)</sup>	6,797,500	19.6%	7,397,500	3.7%	7,397,500	4.4%
Ja-Chin Audrey Lee <sup>(5)</sup>	35,000	*	35,000	*	35,000	*
John F. Erhard	—	—	—	—	—	—
Kerrick S. Knauth	—	—	—	—	—	—
Marco F. Gatti	—	—	—	—	—	—
Steven Berkenfeld	35,000	*	35,000	*	35,000	*
<i>All directors and officers prior to the Business Combination (nine persons)</i>	6,937,500	20.0%	7,537,500	3.8%	7,537,500	4.4%
<i>Directors and officers after the Business Combination:</i>						
Amy E. Ard <sup>(7)</sup>	—	—	854,847	*	854,847	*
Brook F. Porter <sup>(8)</sup>	—	—	2,513,757	1.3%	2,513,757	1.5%
Constance E. Skidmore <sup>(9)</sup>	—	—	121,137	*	121,137	*
Gareth T. Joyce	—	—	—	—	—	—
Jeannine P. Sargent <sup>(10)</sup>	—	—	142,056	*	142,056	*
Jochen M. Goetz <sup>(11)</sup>	—	—	9,408,185	4.8%	9,408,185	5.5%
John F. Erhard	—	—	—	—	—	—
John J. Allen <sup>(12)</sup>	—	—	1,981,581	*	1,981,581	1.2%
Michael D. Smith <sup>(13)</sup>	—	—	146,239	*	146,239	*
Ryan C. Popple <sup>(14)</sup>	—	—	3,864,454	2.0%	3,864,454	2.3%
<i>All directors and officers after the Business Combination as a group (12 persons)</i>	—	—	20,807,759	10.5%	20,807,759	12.2%
<i>Five Percent Holders:</i>						
ArcLight CTC Holdings, L.P. <sup>(15)</sup>	6,797,500	19.6%	6,797,500	3.4%	6,797,500	4.0%
ArcLight CTC Investors, LLC <sup>(16)</sup>	—	—	600,000	*	600,000	*
Adage Capital Partners, L.P. and affiliates <sup>(17)</sup>	2,250,000	6.5%	2,250,000	1.1%	—	—
Daimler Trucks & Buses US Holding Inc. <sup>(18)</sup>	—	—	9,408,185	4.8%	9,408,185	5.5%
Certain funds and accounts advised by Franklin Advisers, Inc. <sup>(19)</sup>	5,116,002	—	23,065,620	11.7%	17,949,618	10.5%
KPCB Holdings, Inc., as nominee <sup>(20)</sup>	—	—	15,875,811	8.0%	15,875,811	9.3%
Entities affiliated with Tao Capital Partners, LLC <sup>(21)</sup>	—	—	11,908,642	6.0%	11,908,642	7.0%

The revelations come as congressional Republicans demand investigations into potential conflicts of interest between the Biden administration and Proterra, which could receive billions in taxpayer funds through a proposed infrastructure package. Rep. Ralph Norman (R., S.C.), who serves as ranking member on the environment subcommittee of the House Committee on Oversight

1 and Reform, told the *Free Beacon* that "the American people deserve to understand the full extent  
2 of Secretary Granholm's involvement with Proterra." "Her position of roughly \$5 million in the  
3 electric car company Proterra is another unfortunate example of politicians using their position for  
4 personal gain," Norman said. "Due to the President's recent unveiling of a \$2 trillion infrastructure  
5 package, this matter should be investigated thoroughly." Deese in April virtually toured Proterra's  
6 South Carolina factory with President Joe Biden, touting a proposed \$45 billion government  
7 investment in "clean, zero-emissions buses" such as those produced by Proterra. Just days later, the  
8 Biden administration again amplified the bus company, hosting Proterra CEO Jack Allen at its  
9 Leaders Summit on Climate. Administration officials repeatedly praised Proterra at the event, and  
10 Allen responded by thanking the White House for its "longstanding support of electric transit buses  
11 and zero emission transportation."

12 "Proterra manufactures half of the U.S.'s electric bus market, which is pretty amazing,"  
13 Biden national climate adviser Gina McCarthy said at the event. "And as you know, funding for  
14 electric school buses is a priority in the American Jobs Plan." McCarthy went on to ask Allen "what  
15 role" the federal government can play in "spurring the demand for zero emission electric vehicles,  
16 including school buses." Granholm also spoke at the summit. The White House did not return a  
17 request for comment on Deese's BlackRock holdings as well as the director's role in planning events  
18 with Proterra. As a top BlackRock executive, **Deese led an investment team tasked with identifying**  
19 **"sustainable" investment opportunities**, according to his online bio. A BlackRock spokesperson  
20 said Deese "was not involved" with the Proterra investment. The Pritzkers, meanwhile, will own  
21 between 6 and 7 percent of Proterra once the company goes public, SEC documents filed by  
22 ArcLight reveal. Nicholas Pritzker is one of two Tao Capital executives with "sole voting and  
23 dispositive power" over the Proterra shares. The investment firm, which did not return a request for  
24 comment, first backed Proterra through a \$10 million stake in 2014. Granholm joined the bus  
25 company's board three years later. During her tenure, Tao Capital co-led another \$155 million  
26 investment in Proterra. "We at Tao are proud to support Proterra in its mission to bring forth a  
27 clean, electric transportation ecosystem," Nicholas Pritzker said in 2018. The firm's website touts  
28 the likes of Proterra, Tesla, and Bird as part of its "Alternative transportation" portfolio.

1  
2 “KPCB Holdings”, on the list above is the notorious John Doerr. A name involved with  
3 other quid pro quo political cases.

4 Nicholas Pritzker and his wife Susan are prolific donors to Democratic candidates and  
5 causes. In the 2020 cycle alone, Susan Pritzker—a Tao Capital director—was the 95th largest donor  
6 in America. She contributed more than \$3 million to Democrats in disclosed money, according to  
7 the Center for Responsive Politics. Nicholas Pritzker has given at least \$1.9 million to Democrats in  
8 direct contributions, including maximum contributions to Biden's campaign and victory fund, FEC  
9 filings show. The government should not enable crony insiders while sabotaging their enemies  
10 using government money.

**EXHIBIT 60 -Witnesses Letter To The FBI**

Craig D Fair  
Special Agent in Charge  
Timothy Stone  
Deputy Special Agent in Charge  
Federal Bureau Of Investigation  
San Francisco Office  
450 Golden Gate Ave, 13th Floor  
San Francisco, CA 94102-9523

May 2, 2021

Dear FBI Team:

As know you, our task force has created a large number of public-interest crowd-sourced testimony websites to provide real-time information, about this case, to your agents. We have spoken to your office on multiple occasions as informants, whistle-blowers, witnesses and providers of testimony about this large criminal matter involving well known public figures..

Congress must be forced to eliminate both the appearance and the actual operation of financial conflicts of interest that we have identified going on every day. Americans must be confident that actions taken by public officials are intended to serve the public, and not those officials and their corrupt Silicon Valley big tech leash-holders. Their actions counter-act the law, The Constitution and general morality. A number of our associates are now dead, under mysterious circumstances. It seems like some of them were killed to shut them up.

We experienced all of the damages from each of the abuse-of-power issues listed below. The FBI, FTC, SEC, FEC must become a taskforce that ends these crimes. These are the crimes we saw and suffered from and the solutions to those crimes:

1 We documented modern bribes being paid through stock market scams. We saw the  
2 perpetrators do it. Please help ban individual stock ownership by Members of Congress, Cabinet  
3 Secretaries, senior congressional staff, federal judges, White House staff and other senior agency  
4 officials while in office. Please prohibit all government officials from holding or trading stock  
5 where its value might be influenced by their agency, department, or actions. The perpetrators are  
6 TODAY committing crimes and corruption in this manner.... [\(READ THE REST AT THIS LINK\)](#)

7  
8 Where Is The Proof, you may ask? Here:

9  
10 **The "Dept Of Energy Leaks" - Aug. 5, 2009 through 2021**

11  
12 **The "Panama Papers" Leaks - April 3, 2016**

13  
14 **The "Swiss Leaks Papers" - February 15, 2015**

15  
16 **The "Paradise Papers Leaks" - November 5, 2015**

17  
18 **The "John Doerr & Kleiner Hacks" - April 22, 2020**

19  
20 **The "Snowden Leaks" - May 13, 2013**

21  
22 **The "Cablegate Leaks - April 15, 2010**

23  
24 **The "Sony Pictures Hack" - November 24, 2014**

25  
26 **The "Ashley Madison Hack" - July 19, 2015**

27  
28 **The "Solarwinds Hack" - December 13, 2020**



**The related FBI, GAO, FTC, IG, SEC, CFTC and related agency files**

**And hundreds of other leaks and hacks publicly dumped on the internet...**

When you cross index all of the public leak data into an AI auditing system, any basic PC computer can FOLLOW THE BRIBE AND PAYOLA MONEY right back to the bank accounts of each corrupt Senator, White House executive and Silicon Valley oligarch! If only The U.S. Government had a federal enforcement agency whose very job it was to do that sort of investigation....Oh, wait,...The U.S. Government has SIX agencies who are supposed to do that...

- Victim/Witnesses' had global character assassination and propaganda-media defamation reprisal attacks operated against them by White House staff and their political financiers: Elon Musk, Larry Page, Steve Jurvetson, Eric Schmidt, Steve Westly, John Doerr, et al. Jury and FBI-compliant evidence proves this as fact.

- All of the offered government money had been hard-wired to political friends ahead of time and there was no possibility that outsider Victim/Witnessess could have received the funds. Victim/Witnessess were lied to and defrauded.

- Victim/Witnesses' were attacked because 1.) they helped law enforcement investigate the attackers, 2.) They competed with the attackers that attacker's products and the Silicon Valley Cartel attackers chose to "cheat rather than compete". Jury and FBI-compliant evidence proves this as fact.

- The attackers spent over \$30M+, part of that using taxpayer resources, attacking the Victim/Witnesses' as proven in the financial transaction records from Google, Gawker, Gizmodo, Jalopnik, Media Matters, Fusion GPS, et al. Jury and FBI-compliant evidence proves this as fact.

- Victim/Witnesses' had been previously funded by The U.S. Government and had a multi-decade relationship with the highest offices of the Government, which provided them with deep knowledge of the crimes that were committed. Jury and FBI-compliant evidence proves this as fact.

- The U.S. Department of Energy is used as a political slush fund to pay back campaign finance millionaires while blockading the competitors of those millionaires from reaching the

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1 market or receiving funding. Jury and FBI-compliant evidence proves this as fact.

2 - The only entities who participated in the global character assassination and propaganda-  
3 media defamation reprisal attacks were those entities owned and controlled by the attackers. Jury  
4 and FBI-compliant evidence proves this as fact.

5 - Through corrupt rare-earth mining scams and control of federal contracts and grants,  
6 attackers had planned to acquire at least one trillion dollars in unjust gains and illegal profiteering.  
7 Jury and FBI-compliant evidence proves this as fact.

8 - This amount of money they sought, and the "Mafia-like" structure they adopted, caused the  
9 suspects to engage in the most extreme crimes, including murder and "Deep State" coup attempts.  
10 Jury and FBI-compliant evidence proves this as fact.

11 - A significant number of person's who were in conflict with the attackers have died in  
12 suspicious manners. Jury and FBI-compliant evidence proves this as fact.

13 - The suspects have hired the largest numbers of lobbyists and corporate manipulation  
14 lawyers in U.S. history in order to manipulate political decisions. Jury and FBI-compliant evidence  
15 proves this as fact.

16 - The suspects have spent more money on political bribes than any group of men has spent  
17 in the last century. Jury and FBI-compliant evidence proves this as fact.

18 - The suspects placed top federal law enforcement and agency bosses (ie: Michelle Lee,  
19 Steven Chu, Kamala Harris, James Comey, et al) from their own Cartel, into top government  
20 positions, with orders to run cover and protection schemes for them. Jury and FBI-compliant  
21 evidence proves this as fact.

22 - California State officials including the Governor, Controller, The Senators, Secretary of  
23 State and regional officials participated in these crimes and pocketed the initial profits from these  
24 crimes in covert investment banking. Jury and FBI-compliant evidence proves this as fact.

25 - Tesla Motors, Google, Netflix, Facebook, Linkedin, Amazon and other tech Cartel  
26 members operate with a common goal of psychological mass ideology manipulation and  
27 monopolistic profiteering based on government sponsored anti-trust violations and server control  
28 exclusivity. Jury and FBI-compliant evidence proves this as fact.

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1 - The attempted cover-ups of these crimes continues to this day. Jury and FBI-compliant  
2 evidence proves this as fact.

3 - Natural-born U.S. citizen Victim/Witnesses #1 has been employed in the USA for many  
4 decades and was a federal contractor/employee. The State of California employment laws now  
5 provide that of of Victim/Witnesses #1's "contractor" was actually "employee" work per California  
6 law. He worked for his community and his country as a law enforcement and intelligence researcher  
7 (law/IC) in which he closed cases that saved Americans billions of dollars. He holds numerous state  
8 and federal certifications and credentials to this effect and was certified as an investigator under the  
9 State Government at the California Office Of Consumer Affairs. He also worked as a CEO,  
10 Inventor and Product Development Director for which The U.S. Government has awarded him  
11 dozens of seminal patent awards for products in use by Microsoft, Sony and other major companies  
12 to provide products and services to billions of people. He has received commendation letters from  
13 U.S. Presidents, Agency heads and Mayors. He is pictured in videos, photographs, articles,  
14 meetings and on letterhead government and corporate correspondence with some of the most  
15 famous public and White House figures in America for decades. He reported the corruption in a  
16 trillion dollar Department of Energy embezzlement scam involving crooked uranium, lithium,  
17 indium and other metals, he was attacked by State and Federal employees, many of whom have now  
18 been terminated because of their illicit actions. Victim/Witnesses was also exposed to those toxic  
19 materials in his work for the Department of Energy.

20 - Part of the state-sponsored attack launched against Victim/Witnesses #1 used the same  
21 exact personnel, servers, digital systems, production equipment and other resources that are owned,  
22 or managed, by Google/Alphabet/YouTube for national election candidate counter-measures  
23 services. Google/Alphabet/YouTube sells these services, under many guises, as offerings to  
24 promote any candidate or damage any candidate for a fee, or for an exchange of items of value. Our  
25 investigators have acquired some of the billing and banking documents verifying this and the FBI  
26 has full access to all such documents proving this assertion. The billing value of the attack against  
27 Victim/Witnesses #1 (in commensurate multiple-billing efforts by Google/Alphabet/YouTube) had  
28 a minimum commercial value of \$30M in billings. This metric is based on records of political

1 election campaign services sold by Google/Alphabet/YouTube since the year 2002. In other words,  
2 in a past elections, hard, documented numbers, employee statements, banking records, stock  
3 records, billing records and other materials exist, in jury trial acceptable form, to prove that, for  
4 example, Google/Alphabet/YouTube spent a certain exact amount of money and resources-of-value  
5 to defeat one candidate and to seek to elect that candidates opposition.

6 - Additionally, relative to the Google/Alphabet/YouTube portion of the attack,  
7 Google/Alphabet/YouTube owners are on federal and Congressional record swearing under oath  
8 that they do "not manipulate search results in order to harm others", yet investigators for  
9 Victim/Witnesses #1 and over 1000 outside third parties proved that the opposite was true and that  
10 Google/Alphabet/YouTube executives lied under oath. The fact that the attack link on Google's  
11 front page never moved position for 5 years and other confirming data, proves the assertion that  
12 Google/Alphabet/YouTube sells defamation and character assassination services and sold them  
13 against Victim/Witnesses. Victim/Witnesses helped place sensors on servers globally which used  
14 comparative search results from competing global search engines to prove that  
15 Google/Alphabet/YouTube was rigging most search results to promote it's friends and harm it's  
16 political and business enemies.

17 - California Senators, White House staff and the owners and executives of  
18 Google/Alphabet/YouTube are also the investor/shareholders in Victim/Witnessess competitors  
19 who were government financed.

20 - The industry metricized standard for person's with, at least, the skills and experience of  
21 Victim/Witnesses, in his demographic, is a minimum of \$10,000 per month in the local technology  
22 market for those with less hours, less patent awards, less past work reference letters and less  
23 experience than Victim/Witnesses. Silicon Valley job metrics and census data prove that that is  
24 even a low figure for a commensurate worker. Lost work opportunity for Victim/Witnesses should  
25 be valued at a minimum of \$10,000.00 per month.

26 - Even though Victim/Witnesses has been an extraordinarily productive, working member of  
27 the community and The U.S. Government ; and Victim/Witnesses has organized companies and  
28 programs which have paid millions of dollars in taxes, Victim/Witnesses is currently only afforded

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1 the most minimal benefits possible. In other words, Victim/Witnesses has saved billions of dollars  
2 for the Government and the taxpayers and, additionally, has organized companies and programs  
3 which paid millions of dollars in taxes and free services to The Government yet Victim/Witnesses  
4 seems to be getting only political reprisals as gratitude.

5  
6 - State and Federal employee corruption and reprisal actions cost Victim/Witnesses his savings and  
7 nearly a billion dollars of potential income by intentionally sabotaging and terminating his  
8 operating, Congressional financed, Congressional commended national service companies featured  
9 on NPR, CBS News, and in The Wall Street Journal, The New York Times and hundreds of other  
10 mainstream news outlets. Corrupt State and Federal employees engaged in these benefit blockade  
11 reprisals because Victim/Witnesses's companies competed with the stock market holdings of those  
12 corrupt State and Federal employees.

13  
14 - These are the very same public officials who have interdiction capability at state and federal  
15 agencies. It is quite reasonable to assume that these State and Federal employees, who have a court  
16 record of using reprisal actions against others, just like they did to Victim/Witnesses, ordered  
17 federal agencies to harm Victim/Witnesses. These public officials defrauded Victim/Witnesses by  
18 asking and causing him, and his Team, to invest in their program. It turned out they were using  
19 Victim/Witnesses's business ventures to cover (smoke-screen) their crimes at the expense of  
20 Victim/Witnesses and the taxpayers.

21  
22 - To be clear, Government employees put hundreds of millions of dollars of stock market profits in  
23 their, and their associates pockets, part of which they took from Victim/Witnesses's funding, and  
24 then attacked Victim/Witnesses, in a large number of reprisal actions.

25  
26 - Victim/Witnesses reported crimes by public officials which led to the FBI raid of Solyndra,  
27 opened the Uranium One investigation and the firing of the Secretary Of Energy for corruption. Part  
28 of Victim/Witnesses's work involved creating America's next national energy solutions.

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1 - Victim/Witnesses worked with the U.S. Department of Energy, HUD, NAHB and related  
2 entities in work with the national weapons and energy labs since 2000. Victim/Witnesses worked  
3 with nuclear, heavy metals, sintered rare earth metals, extreme solvents and nano-particulated exotic  
4 chemistries and won a historical Congressional commendation, first-ever seminal U.S. Government  
5 patent awards, industry and press acclaim, customer acclaim and a multi-million dollar lab research  
6 grant in the Congressional Iraq War Bill.

7 - Even though Victim/Witnesses's has worked in service to his country, Victim/Witnesses  
8 has been denied his legal rights. Victim/Witnesses's U.S. Constitution and California Constitutional  
9 rights have been denied because he "did the right thing" and helped law enforcement.

10  
11 - The most senior FBI and DOJ executives including James Comey, Andrew McCabe, Peter Strzok,  
12 David Oh and others are under federal investigation for running character assassinations and  
13 working with the economic assassins from Fusion GPS, Google Media, Gawker Media and other  
14 illicit attack organizations. Victim/Witnesses reported to some of these men. Charges of FBI, DOJ,  
15 VA and SSA executive reprisal manipulations and attacks against citizens would have sounded hard  
16 to believe a decade ago but, in the post-Snowden world, catching those who pervert State and  
17 Federal offices has become common-place. It is beyond reasonable to assume that  
18 Victim/Witnesses's charges of government agency reprisal-stonewalling are well founded and have  
19 full legal merit.

20 - The services who charge to perform the support work for such attacks provide a life-time  
21 placement of negative attack data on Google and on all of the Axiom, Taleo and other hiring HR  
22 and hiring databases, globally; and the locking, on the front top page of Google search results,  
23 forever, of the attack and defamation data, as was done because Victim/Witnesses testified to  
24 Congress, the GAO and the FBI.

25 - The attacks on Victim/Witnesses were "State Sponsored Attacks" directed, financed and  
26 managed by California State public officials and Federal Agency officers.

27 - Instead of the "Thanks of a grateful nation", Victim/Witnesses has received political  
28 reprisals, revenge and vendettas using taxpayer financed resources. Victim/Witnesses has

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1 contributed more in the service of his country and community than most citizens. We ask your  
2 office to Correct the Record and the Nick Denton tabloid empire and bring fairness and justice to  
3 the finalization of this case. Victim/Witnesses, his family, friends, associates and others will pursue  
4 this forever, through the media, law enforcement and alternative means ...until it is fairly resolved.

5 - The suspects in these crimes received over 50 billion dollars in profits from the crimes.

6  
7 - The suspects received over 50 billion dollars at the expense of the Victim/Witnesses' because they  
8 intentionally, maliciously and in a coordinated manner, circumvented, those monies from the  
9 Victim/Witnesses' and the victim's income streams.

10  
11 - The amount of money that the suspects acquired from these crimes is confirmed by reports at the  
12 Securities and Exchange Commission, The Internal Revenue Service, the FTC and stock market  
13 transfer records.

14  
15 - Each competing company of the Victim/Witnesses's that the suspects sabotaged had the potential  
16 to make as much money, or more money, than the suspects companies did in the same time period.  
17 Victim/Witnesses's companies would have operated competitively had they not been sabotaged by  
18 the government officials. These other companies offered lower cost, safer, longer range products  
19 which higher volumes of consumers had demanded. This means that, if these companies had not  
20 been sabotaged by these corrupt government officials who, owned stock in these insider companies,  
21 they would have made even more money than the insider companies.

22 - Thus, and by extension, the corrupt Senator's and White House staff stock ownership's in  
23 Victim/Witnesses's competitor's, provide a minimum baseline damages amount reference for  
24 comparable damages values using GAAP accounting references. Each competing company that  
25 suspects sabotaged, had the potential to make as much money, or more money, than known  
26 competing company revenues.

27 - The government officials used character assassination as a vendetta process to seek to  
28 destroy the brands, reputations and witness testimony of the Victim/Witnesses' by manipulating

1 their properties.

2 - The suspects hired Fusion GPS, Black Cube, Google, Media Matters, Gizmodo and  
3 Gawker Media to author and distribute character assassination propaganda to the majority of the  
4 world's population via their pre-arranged and contrived control of the vast majority of digital media.  
5 For example, Google, the stock of which is owned by the suspects, locked the attacks on the front  
6 page on the top line of Google for over five years, without ever moving it, even though  
7 Victim/Witnesses's purchased thousands of servers, and take-down requests to attempt to move the  
8 attacks even a few lines lower. This proves that Google was manually, and daily rigging the attacks.  
9 Thus, the damages award to the Victim/Witnesses should be much higher than the Terry Bollea  
10 award.

11 - Government funding which was circumvented by suspects from Victim/Witnesses to  
12 themselves was not the largest quantified value of loss. Working with Goldman Sachs, JP Morgan,  
13 McKinsey, etc., suspects exploited the White House relationship with The Fed and the SEC to  
14 create a massive stock market valuation padding scheme which yielded historical profits. By stating  
15 government funds as "profit" and switching back and forth from stock skims to government funds  
16 in accounting records, tremendous stock market profits were placed in the pockets of the suspects.

17 - Had Victim/Witnesses's not been circumvented by suspects then Victim/Witnesses's would  
18 have acquired these same benefits. The stock market loss to the Victim/Witnesses's at the expense  
19 of the Victim/Witnesses's is also calculated into the damages consideration.

20 - The suspects ordered Steven Chu, Lachlan Seward, Carol Battershel, McKinsey and  
21 Deloitte Consulting, Kathy Zoi and other executives at the U.S. Department of Energy, to be placed  
22 into positions in the U.S. Department of Energy as shills on their behalf, to lie to and defraud the  
23 Victim/Witnessess. All of the ATVM and LGP grant and loan funds from the U.S. Department of  
24 Energy had been secretly hard-wired and the distribution of it covertly arranged to go to the  
25 suspects stealthed stock ownerships.

26 - Thus, the Victim/Witnessess, who had superior technology, more customer orders, better  
27 value and provided less of a national security risk were defrauded into spending tens of millions of  
28 dollars on the Victim/Witnesses process via false promises and assurances of success which were



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1 already known to be lies from the first 2007 forward. The losses in time, expenses and time-to-  
2 market delays created by these fraudulent promises and assertions by the agents, in public office,  
3 covertly working for the suspects are calculated into these damages.

4 - Victim/Witnesses's are demanding from The U.S. Government , The California State  
5 Government and the individual suspect/Defendants; general damages according to proof; special  
6 damages according to proof; exemplary or punitive damages; For a preliminary injunction and a  
7 permanent injunction enjoining defendant and their/her agents, servants, and employees, and all  
8 persons acting under, in concert with, or for him/her from continuing to publish the above-described  
9 private facts about Victim/Witnesses's; for costs of suit herein incurred; for such other further relief  
10 as the court may deem proper; and for an award of a percentage of suspect/Defendants gross  
11 revenue since inception wherein that revenue was derived from profits made from the use of, or  
12 interdiction of, Victim/Witnesses's patented and trade secret products, services and technology  
13 which Defendants covertly acquired information about and copied for profit. Forensic accounting  
14 based on Subpoenas against the suspects and attack providers, and further FBI support, will be  
15 required to finalize the amount but recent leaks and witness testimony confirm the veracity of these  
16 assumptions.

**EXHIBIT 61 - State-Sponsored Reprisal Attacks Suffered By Plaintiffs**

***CIA, In-Q-Tel, Black Cube Mossad and other spy operatives contracted their services to White House and Senate senior officials to attack and destroy reporters, whistle-blowers and other Victim/Witnesses'.***

The United States Government and State of California senior officials own the stock in Tesla, Facebook, Google and other tech companies and take their orders from those companies. that is "criminal collusion"!

*"these are the reprisal attacks that they ran against us, in vendetta, that we are now, legally, sending straight back to each of them...."*

**Senators and oligarchs run an organized crime operation.** The Victim/Witnesses' were attacked with a \$30M+ state-sponsored reprisal attack program which included the following attack tactics operated by the same WHITE HOUSE "OPPOSITION RESEARCH" AND ATTACK TEAM used to attack opposition Presidential candidates and reporters that were in disfavor.

Just like Bin Laden was caught by tracking his "relay-men", The Silicon Valley Cartel has their Steve Westly's, David Plouffe's, Jay Carney's, Nick Denton's, David Brock's, and the other little sociopath sociopolitical manipulations bastards who always seem to escape the law. They have not escaped public forensics, though.

Now the Victim/Witnesses' have demanded that the FBI, and others, bug, hack and forensically track them to expose the coordinating/colluding/conspiring structure of the same little rats nest of CPA, PAC, fake charities, trust funds, fake shell companies, tech law firms and other dirty tricks operatives that they use to run their Cartel. The Panama Papers leaks exposed one corner of their system. From there it was easy to drill into the heart of this financial and political crime operation. The forensic accounting trails all lead back to the exact same crooks. It is no coincidence that they all use the same people and transfer the cash through the same routes.

The attacks on the Victim/Witnesses' could only have been accomplished by White House and Department of Energy operatives. Only they had the resources and experience to undertake

1 something this heinous and spy agency-like. The funding for the attacks tracks right back to them,  
2 too. Ask the FBI what the forensic tracking of the attackers revealed!

3 Investigations have revealed that the White House and California Senators hired the  
4 character assassination and defamation attack services: Cardinal & Pine; **Pacronym, Acronym**; The  
5 Americano; Investing in US; **Shadow Inc**; **Courier Newsroom**; **IN-Q-Tel**; **Gawker Media**;  
6 **Jalopnik**; **Gizmodo Media**; **K2 Intelligence**; **WikiStrat**; **Podesta Group**; **Fusion GPS**; Google;  
7 **YouTube**; **Alphabet**; **Facebook**; **Twitter**; **Think Progress**; **Media Matters**); **Black Cube**; **Correct**  
8 **the Record** and the **Nick Denton tabloid empire**; **Orbis Business Intelligence**, **Undercover Global**  
9 **Ltd**; **Stratfor**; **Jigsaw**; **ShareBlue/Acronym**; **Versa LLC**; **American Ledger**; **Supermajority News**;  
10 **New Venture Fund**; **Sixteen Thirty Fund**; **Cambridge Analytica**; **Sid Blumenthal**; States  
11 Newsroom; **Hopewell Fund**; **Open Society.**; **David Brock**; **AmpliFire News**; **American Bridge**;  
12 **Plouffe Consulting**; **Pantsuit Nation**; **MotiveAI**; **American Bridge 21st Century Foundation**;  
13 **Priorities USA**; **PR Firm Sunshine Sachs**; **The American Independent Foundation**; **Covington**  
14 **and Burling**; **Buzzfeed**; The American Independent; **Perkins Coie**; **Secondary Infektion**; **Wilson**  
15 **Sonsini** and thousands more to run hit-jobs, character assassinations, dirty tricks and economic  
16 reprisal attacks on any targets who reported the crimes. Each of those companies are now under  
17 federal and civil investigation. Most of these businesses offer the service of manipulating elections  
18 and news coverage in order to steer stock market profits into the pockets of billionaire clients at the  
19 expense of the taxpayer and Democracy. They hide their transactions via money-laundering. All of  
20 these services, when focused on individual citizens, are lethal.  
21  
22  
23  
24

25 Why would we go to this much trouble to take these people down? because they did these  
26 things to us in reprisal for reporting their crimes:

27  
28 **1.) Defrauding Victim/Witnessess via fake government requests to invest in rigged**

1 **government contracts;**

2  
3 **2.) Placing moles and spying inside Victim/Witnesses's companies;**

4  
5 **3.) Blockading legal counsel for Victim/Witnesses's;**

6  
7 **4.) Character assassination and sophisticated contracted defamation media attacks;**

8  
9 **5.) Offshore factory processed social media attacks;**

10  
11 **6.) Government benefits from SSA, HUD, etc, blockades and manipulations;**

12  
13 **7.) Jobs and venture capital funding blacklisting;**

14  
15 **8.) FOIA obfuscation for official government FOIA filings;**

16  
17 **9.) Arbitrary government deadline manipulation for SSA, GOVT, HUD and other**  
18 **applications;**

19  
20 **10.) Creation of endless fake hurdles in agency applications (ie: GOVT) to protect rigged**  
21 **"winners";**

22  
23 **11.) Toxic workplace poisonings like the Salisbury, Nalvany, Litvinenko poisonings;**

24  
25 **12.) Workplace sabotage and obstruction of Victim/Witnesses's companies;**

26  
27 **13.) Media defamation attacks via gawker, Gizmodo, Jalopnik, Google, Youtube, etc.;**

- 1 **14.) Commercial employment database "lois lerner-ing" and red-flagging;**
- 2
- 3 **15.) Murders of peers (ie: Rajeev Motwani, Seth Rich, Gary D. Conley and 120+ others);**
- 4
- 5 **16.) Revenue blockades and internet income re-direction;**
- 6
- 7 **17.) Troll farm attack teams hired from Chinese attack farms;**
- 8
- 9 **18.) Fusion GPS, Media Matters, David Plouffe attack contracts issued targeting whistle-**
- 10 **blowers;**
- 11
- 12 **19.) Manual search engine lock-in attacks on Google, YouTube, LinkedIn;**
- 13
- 14 **20.) U.S. patent office manipulation to blockade revenue;**
- 15
- 16 **21.) Honey-traps sent out targeting the whistle-blowers;**
- 17
- 18 **22.) Fake news tabloid empires created just for defamation attacks;**
- 19
- 20 **23.) Housing access and financing blockades created to reprisal harass whistle-blowers;**
- 21
- 22 **24.) Ongoing hacking of Victim/Witnesses's devices;**
- 23
- 24 **25.) Tech industry black-list coordination within the National Venture Capital Association;**
- 25
- 26 **26.) HUD and USDA mortgage rights blockades;**
- 27
- 28 **27.) DNS and IP routing manipulation to prevent Victim/Witnesses' from selling anything**

1 online;

2  
3 **28.) Digital attacks designed to put horrific fake news about target in front of 7.5 billion**  
4 **people...**

5  
6 and more spy agency type "dirty tricks"that cost the Victim/Witnesses' their lives, life savings,  
7 income and other disabling losses. Diane Feinstein, Nancy Pelosi, Harry Reid, White House Staff,  
8 Department of Energy Executives, and others, have the power, with a single phone call, to  
9 implement all of the above attacks.

10 *"They all had the means and motivation. They all had stock market profits affected by this.*  
11 *They all had been proven to have contracted FUSION GPS and other attack services on multiple*  
12 *occasions! They all will do ANYTHING to cover up these crimes! If these people could do these*  
13 *things to us then it must be completely legal to do these things right back to them, correct? Their*  
14 *attacks prove that our assertions are true because nobody would undertake such large, state-*  
15 *sponsored attacks, unless they were afraid these particular crimes would come to light."*

16 **2021A - Documented Attack Incident On Victim/Witnesses':** Government agency bosses  
17 solicited the target with false promises of future loans, contracts or grants from their agency and  
18 caused the target victim to expend millions of dollars and years of their time for projects which  
19 those government bosses had covertly promised to their friends. They used the target victim as a  
20 "smokescreen" to cover their illegal government slush-funds for the Victim/Witnesses' competitors  
21 and personal enemies. By using this tactic, the attackers drain the target Victim/Witnesses' funds  
22 and forced victim into an economic disaster without the government bosses fearing any reprisal for  
23 their scam in which they made billions of dollars in profit in the notorious Solyndra scandals as seen  
24 in the CBS 60 Minutes episode: **"The Cleantech Crash"**, thousands of TV news segments and the  
25 related GAO and Congressional corruption reports.  
26  
27

28 **2021B - Documented Attack Incident On Victim/Witnesses':** Government officials and

1 LSC corporation (A federal agency dedicated to providing legal services to Victim/Witnesses')  
2 blockaded victim's rights to legal representation in order to prevent victim from personally suing  
3 the attackers because such a lawsuit would have embarrassed corrupt public officials. High tech law  
4 firms that were discussing a services agreement with victim were threatened and ordered to not help  
5 victim or "*they would be black-listed or be cut-off from tens of millions of dollars of Google,*  
6 *Netflix, Facebook and government contracts*". Individual lawyers were threatened with black-listing  
7 and getting "*flooded with more filings than you could ever respond to in your life-time...*" LSC  
8 officials, who were almost entirely Obama Administration associates, refused to assist with lawyer  
9 referrals, which is against their federal contract.  
10

11  
12 **2021C - Documented Attack Incident On Victim/Witnesses':** A sophisticated animated  
13 attack film was produced attacking victim. An animated film is an expensive effort involving  
14 considerable time and expense. An attacker must be well financed to undertake such an effort. The  
15 film was published on YouTube and locked onto the very top search result line on every YouTube  
16 search in front of 5 billion internet users for over a decade. The damage to victim's reputation is  
17 estimated in the tens of millions of dollars. YouTube steadfastly refused to remove or adjust the  
18 search results even though YouTube executives knew victim and knew that the video represented a  
19 character assassination attempt against victim because YouTube owners finance the political  
20 campaigns of the public officials who ordered the attacks. While Google/YouTube stated to  
21 Congress that all of it's search results are arbitrary, the never-moving search result of this attack  
22 video proved that Google's and YouTube's search results are manually manipulated by human  
23 maintained black-lists.  
24

25  
26 **2021D - Documented Attack Incident On Victim/Witnesses':** Social networking sites  
27 including MeetUp, Match, Facebook, etc. and all other IAC-owned, or similar, sites (IAC is  
28 managed by Hillary Clinton's daughter, whose Mother knew victim) have had their profiles, texts,

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1 and inter-member communications, since those companies were started, hacked or purchased. The  
2 financiers of almost everyone of these sites are also the financiers of the suspects. The attack service  
3 providers use Palantir , In-Q-Tel financed data analysis software to analyze every activity in those  
4 services in order to find honey-trap, blackmail and social conflict exploitation opportunities. Your  
5 social life will, essentially, end. Every photo on every social site is cross checked with every other  
6 photo on the internet in order to cull your Facebook, Linkedin, Snapchat and other social media  
7 together to create a total manipulation profile data file on you. New contacts on these sites were  
8 contacted by the attackers and told to “avoid” the victim in order to damage victim.  
9

10  
11 **2021E - Documented Attack Incident On Victim/Witnesses':** Social Security, SSI, SDI,  
12 Disability and other earned benefits were stone-walled. Applications for benefits for the victim were  
13 intentionally “lost” like a “Lois Lerner hard drive”. Files in the application process “disappeared”.  
14 A U.S. Senator ordered Victim’s benefits to “never be approved” even though victim worked 60  
15 hour+ weeks for decades in service to their nation and their community. A SSA official in the local  
16 SSA office, who had a devout expressed hatred against one United States President ordered a  
17 benefits blockade against victim because he found out that victim’s ex-lawyer now worked in the  
18 White House.  
19

20  
21 **2021F - Documented Attack Incident On Victim/Witnesses':** Government officials and  
22 tech oligarchs contacted members of the National Venture Capital association (NVCA) and created  
23 national “black-lists” to blockade victim from receiving investor funding. This was also confirmed  
24 in a widely published disclosure by Tesla Motors Daryl Siry and in published testimony. If Silicon  
25 Valley political campaign finance oligarchs black-list you (see the "AngelGate" Scandal and the  
26 "High Tech No Poaching Class Action Lawsuit" cases) you will never get investor funding again.  
27

28 **2021G - Documented Attack Incident On Victim/Witnesses':** Federal FOIA requests



1 were hidden, frozen, stone-walled, delayed, lied about and only partially responded to in order to  
2 seek to hide information and run cover-ups.

3  
4 **2021H - Documented Attack Incident On Victim/Witnesses':** State and federal officials  
5 play an endless game of Catch-22 by arbitrarily determining that deadlines had passed that they, the  
6 government officials, had stonewalled and obfuscated applications for, in order to force these  
7 deadlines that they set, to appear to be missed.

8  
9 **2021I - Documented Attack Incident On Victim/Witnesses':** Victim/Witnesses' was  
10 found to be strangely poisoned, not unlike the Alexander Litvenko case. Heavy metals and toxic  
11 materials were found right after victim's work with The U.S. Government weapons and energy  
12 facilities. Many wonder if victim was intentionally exposed to toxins in retribution for their  
13 testimony. The federal MSDS documents clearly show that a number of Victim/Witnesses' were  
14 exposed to deadly compounds and radiations, via GOVT, without being provided with proper  
15 HazMat suits which GOVT officials knew were required.

16  
17  
18 **2021J - Documented Attack Incident On Victim/Witnesses':** Victim/Witnesses'  
19 employers were called, and faxed, and ordered to fire target Victim/Witnesses' from their places of  
20 employment, in the middle of the day, with no notice, as a retribution tactic.

21  
22 **2021K - Documented Attack Incident On Victim/Witnesses':** On orders from Obama  
23 White House officials Google, YouTube, Gawker Media and Gizmodo Media produced attack  
24 articles and defamation videos. Google locked these contrived attack articles from the Nicholas  
25 Guido Denton tabloid empire on the top line, of the front page of all Google searches for a decade  
26 in front of 7.5 billion people, around the world. This attack-type uses over \$40 million dollars in  
27 server farms, production costs and internet rigging. The forensic data acquired from tracking some  
28

of these attacks proves that Google rigged these attacks against victim on the internet and that all of Google's "impressions" are manually controlled by Google's executives who are also the main financiers and policy directors of the Obama Administration. This data was provided to the European Union for it's ongoing prosecution of Google's political manipulation of public perceptions. Hired attackers Nicholas Guido Denton, John Herman, Adrian Covert, Ian Fette, Patrick George, Gabrielle Darbyshire and John Cook have been referred to the FBI for surveillance, tracking and interview relative to the command, control and compensation for those attacks.

**2021L - Documented Attack Incident On Victim/Witnesses':** Victim/Witnesses' HR and employment records, on Taleo, Palantir and EVERY recruiting and hiring database, was embedded with negative keywords and "flags" in order to prevent the victim from ever gaining future employment.

**2021M - Documented Attack Incident On Victim/Witnesses':** Gary D. Conley, Seth Rich, Rajeev Motwani who victim knew, and many other whistle-blowers in these matters, turned up dead under strange circumstances. Victim has received ongoing death threats for his help to federal investigations in the larger organized crime investigation relative to this matter. You might wonder why energy deals get people killed. You might wonder why Joe Biden's son Hunter was running an energy company he knew nothing about. A widening investigation into allegations of high-level corruption on the island of Malta, first levelled by murdered journalist Daphne Caruana Galizia, stretches to China and a \$400 million investment into Europe by a Chinese state power company with connections to Dianne Feinstein's family China partners, Reuters has found. Caruana Galizia was murdered in October 2017 as she investigated a web of companies that she believed were funneling bribes to Maltese politicians. Now, Reuters and a consortium of journalists have traced two firms involved in that web to relatives of a senior Chinese executive for Accenture, the global consultancy firm. The executive, 43-year-old Chen Cheng from Shanghai, negotiated investments

on behalf of China's state-owned Shanghai Electric Power in Malta and in another small European state, Montenegro, over the past decade, according to Maltese officials and official records. The revelation of a Chinese connection potentially adds a new international dimension to a scandal that has rocked Malta's government and last year led to the resignation of the prime minister. It also could figure in a series of Maltese official investigations into the events leading up to Caruana Galizia's death. Backed by Malta's government, the investments by Shanghai Electric Power were portrayed by Maltese and Chinese political leaders as one component of China's multi-trillion dollar Belt and Road initiative to pour money into economic infrastructure in central Asia and Europe. In 2016, a year before she was murdered in a car bombing, Caruana Galizia identified Chen's key role in the transactions on her blog. Reporter David Bird was looking into these energy connections and he was then found dead in the woods on the East Coast. A total of six people in Malta have been charged with Caruana Galizia's killing and await trial. Caruana Galizia reported that Chen created a company in the British Virgin Islands in 2014, for an unknown purpose. In the same year, Chen played a central role in negotiations and due diligence for Shanghai Electric Power to invest 380 million euros (\$400 million) in buying a share of Malta's state power company, Enemalta. Caruana Galizia did not specify any wrongdoing by Chen. Chen and Accenture did not respond to Caruana Galizia's report at the time. Now, reporters at Reuters, the Times of Malta, the Organized Crime and Corruption Reporting Project and the Süddeutsche Zeitung, have discovered that Chen's family set up two further companies in Hong Kong, both with business links to Malta. The first of the companies set up by the Chen family, known as Macbridge, planned to pay up to \$2 million to Panama firms controlled by two Maltese politicians, Reuters has previously reported. The second, called Dow's Media Company, received one million euros (\$1.2 million) from a business owned by one of Malta's richest men, Yorgen Fenech, according to financial records seen by Reuters. Fenech is in jail, awaiting trial on a charge of masterminding Caruana Galizia's murder. He has pleaded not guilty. According to international legal requests seen by Reuters, Maltese law enforcement officials suspect that Macbridge and Dow's Media were part of an elaborate scheme, involving some participants in the China-Malta deals, to make payments to politicians in Malta and siphon off profits for themselves. The Panama Papers Leaks, The Swiss Leaks And Wikileaks have shown that

dirty CPA firms for American politicians and Silicon Valley oligarchs were all laundering money through these shared illegal conduits.

**2021N - Documented Attack Incident On Victim/Witnesses':** Paypal (A DNC-biased operation) and other on-line payments for on-line sales by victim are de-platformed, delayed, hidden, or re-directed in order to terminate income potential for target who competed with the attackers interests and holdings. This further denied victim income. As a test, victim built an online store with hundreds of thousands of products and marketed it globally. Trackers, placed by victim's technicians, on servers, discovered that Paypal and an outside "Virgina-based system" were DNS and payment re-directed all traffic away from the store so that victim received no traffic and no income. In DNS redirection, "website spoofing" sends target Victim/Witnesses' websites to dead ends where no sales orders or customer inquiries actually get back to the target. These internet revenue activity manipulations are conducted using outside covert servers operated by the attackers and revealed in the Snowden Leaks. All commercial storefronts and on-line sales attempts by target Victim/Witnesses', had their sites hidden, or search engine de-linked by a massively resourced facility located in Virginia, Texas or Palo Alto, California in order to terminate revenue potentials for the victim.

**2021O - Documented Attack Incident On Victim/Witnesses':** Contracted trolls, shills, botnets and synth-blog deployments are deployed to place defamatory statements and disinformation about victim in front of 7.5 billion people around the world on the internet in order to seek to damage their federal testimony credibility by a massively resourced facility. Some of these troll farms were uncovered in Russia, Ukraine, Israel and Brazil.

**2021P - Documented Attack Incident On Victim/Witnesses':** Campaign finance dirty tricks contractors were hired by campaign financiers to attack the friends and family members of the

target victim in order to create low morale for the target Victim/Witnesses' psyche and motivation.

**2021Q - Documented Attack Incident On Victim/Witnesses':** In one case covert political partner: Google, transferred large sums of cash to dirty tricks contractors and then manually locked the media portion of the attacks into the top lines of the top pages of all Google searches globally, for years, with hidden embedded codes in the links and web-pages which multiplied the attacks on Victim/Witnesses' by many magnitudes.

**2021R - Documented Attack Incident On Victim/Witnesses':** Covert Cartel financier: Google, placed Google's lawyer: Michelle Lee, in charge of the U.S. Patent Office and she, in turn, stacked all of the U.S. Patent Office IPR and ALICE review boards and offices with Google-supporting employees in order to rig the U.S. Patent Office to protect Google from being prosecuted for the vast patent thefts that Google engages in. Google has hundreds of patent lawsuits for technology theft and a number of those lawsuits refer to Google's operations as "Racketeering", "Monopolistic Cartel" and "Government Coup-like" behaviors. Thousands of articles and investigations detail the fact that Google, "essentially" ran the Obama White House and provided over 80% of the key White House staff. A conflict-of-interest unlike any in American history. Google's investors personally told Victim they would "kill him". Google and the Obama Administration were "the same entity". Victim testified in the review that got Michelle Lee terminated and uncovered a tactical political and social warfare group inside Google who were financed by Federal and State funds.

**2021S - Documented Attack Incident On Victim/Witnesses':** "Honeytraps" and moles were employed by the attackers. In this tactic, people who covertly worked for the attackers were employed to approach the "target" in order to spy on and misdirect the subject. The State-Sponsored Spies And Hired Character Assassins Of Match.com. Victim/Witnesses' employed some of the founder's of Match.com and has intimate knowledge of the Match.com organization's intelligence and dirty tricks sub-set. Over 1000 profiles on Match.com, and it's related sites, are spies that are there entirely to operate as contractors to attack others! Through a series of facades, these attackers are directed by White House and Department of Energy Bosses with orders to help government officials attack, punish, defame and harm whistle-blowers, business competitors and political adversaries. Since 2008, one San Francisco business man has recorded over 20 of these spy girls

1 recording him and reporting back to his competitor. He has placed a private investigation firm on  
2 long-term contract to hunt down and prosecute these spider-women who sell entrapment services  
3 and operate under cover of Match.com's guise.

4  
5 While naive readers may laugh at such a claim, there is now public record proof that a  
6 network of activists, aided by a British former spy, mounted a campaign during a national election  
7 campaign, using Match.com, to discredit perceived enemies of candidates inside the government,  
8 according to documents and people involved in the operations.

9  
10 The campaign included a planned sting operation against the national security adviser at the  
11 time, H.R. McMaster, and secret surveillance operations against FBI employees, aimed at exposing  
12 certain cronyism sentiment in the bureau's ranks.

13 The operations against the FBI, run by the conservative group Project Veritas, were  
14 conducted from a large home in the Georgetown section of Washington that rented for \$10,000 per  
15 month. Female undercover operatives arranged Match.com dates with the FBI employees with the  
16 aim of secretly recording them making disparaging comments about competitors.

17 The campaign shows the obsession that some of competitors's allies had about a shadowy  
18 "deep state" trying to blunt his agenda — and the lengths that some were willing to go to try to  
19 purge the government of those believed to be disloyal to the president.

20 Central to the effort, according to interviews, was Richard Seddon, a former undercover  
21 British spy who was recruited in 2016 by security contractor Erik Prince to train Project Veritas  
22 operatives to infiltrate trade unions, Democratic congressional campaigns and other targets. He ran  
23 field operations for Project Veritas until mid-2018.

24 Last year, The New York Times reported that Seddon ran an expansive effort to gain access  
25 to the unions and campaigns and led a hiring effort that nearly tripled the number of the group's  
26 operatives, according to interviews and deposition testimony. He trained operatives at the Prince  
27 family ranch in Wyoming.

28 The efforts to target American officials show how a campaign once focused on exposing

1 outside organizations slowly morphed into an operation to ferret out competitors's perceived  
2 enemies in the government's ranks.

3 Whether any of competitors's White House advisers had direct knowledge of the campaign  
4 is unclear, but one of the participants in the operation against McMaster, Barbara Ledeen, said she  
5 was brought on by someone "with access to McMaster's calendar."

6 At the time, Ledeen was a staff member of the Senate Judiciary Committee, then led by Sen.  
7 Chuck Grassley, R-Iowa.

8 This account is drawn from more than a dozen interviews with former Project Veritas  
9 employees and others familiar with the campaign, along with current and former government  
10 officials and internal Project Veritas documents.

11 The scheme against McMaster, revealed in interviews and documents, was one of the most  
12 brazen operations of the campaign. It involved a plan to hire a woman armed with a hidden camera  
13 to capture McMaster making inappropriate remarks that his opponents could use as leverage to get  
14 him ousted as national security adviser.

15 Although several Project Veritas operatives were involved in the plot, it is unclear whether  
16 the group directed it. The group, which is a nonprofit, has a history of conducting sting operations  
17 on news organizations, Democratic politicians and advocacy groups.

18 The operation was ultimately abandoned in March 2018 when the conspirators ended up  
19 getting what they wanted, albeit by different means. The embattled McMaster resigned on March  
20 22, a move that avoided a firing by the president who had soured on the three-star general.

21 Project Veritas did not respond to specific questions about the operations. On Thursday,  
22 James O'Keefe, the head of the group, said this article was "a smear piece."

23 Neither Seddon nor Prince responded to requests for comment. McMaster declined to  
24 comment.

25 When confronted with details about her involvement in the McMaster operation, Ledeen  
26 insisted that she was merely a messenger. "I am not part of a plot," she said.

27 The operation against McMaster was hatched not long after an article appeared in BuzzFeed  
28 News about a private dinner in 2017. Exactly what happened during the dinner is in dispute, but the

1 article said that McMaster had disparaged competitors by calling him an “idiot” with the  
2 intelligence of a “kindergartner.”

3 That dinner, at an upscale restaurant in downtown Washington, was attended by McMaster  
4 and Safra Catz, the chief executive of Oracle, as well as two of their aides. Not long after, Catz  
5 called Donald McGahn, then the White House counsel, to complain about McMaster’s behavior,  
6 according to two people familiar with the call.

7 White House officials investigated and could not substantiate her claims, people familiar  
8 with their inquiry said. Catz declined to comment, and there is no evidence that she played any role  
9 in the plot against McMaster.

10 Soon after the BuzzFeed article, however, the scheme developed to try to entrap McMaster:  
11 Recruit a Match.com woman to stake out the same restaurant, Tosca, with a hidden camera.  
12 According to the plan, whenever McMaster returned by himself, the woman would strike up a  
13 conversation with him and, over drinks, try to get him to make comments that could be used to  
14 either force him to resign or get him fired.

15 Who initially ordered the operation is unclear. In an interview, Ledeen said “someone she  
16 trusted” contacted her to help with the plan. She said she could not remember who.

17 “Somebody who had his calendar conveyed to me that he goes to Tosca all the time,” she  
18 said of McMaster.

19 According to Ledeen, she passed the message to a man she believed to be a Project Veritas  
20 operative during a meeting at the University Club in Washington. Ledeen said she believed the man  
21 provided her with a fake name.

22 By then, McMaster already had a raft of enemies among competitors loyalists, who viewed  
23 him as a “globalist” creature of the so-called deep state who was committed to policies they  
24 vehemently opposed, like remaining committed to a nuclear deal with Iran and keeping American  
25 troops in Afghanistan.

26 The president often stoked the fire, railing against national security officials at the CIA, FBI,  
27 State Department and elsewhere who he was convinced were trying to undermine him. These  
28 “unelected deep-state operatives who defy the voters to push their own secret agendas,” he said in



2018, “are truly a threat to democracy itself.”

Seddon recruited Tarah Price, who at one point was a Project Veritas operative, and offered to pay her thousands of dollars to participate in the operation, according to interviews and an email written by a former boyfriend of Price and sent to Project Veritas exposed, a group that tries to identify the group’s undercover operatives.

The May 2018 email, a copy of which was obtained by The Times, said that Price was “going to get paid \$10,000 to go undercover and set up some big-name political figure in Washington.” It was unclear who was funding the operation. Price’s former boyfriend was apparently unaware of the target of the operation, or that McMaster had been forced to step down in March.

Two people identified the political figure as McMaster. Price did not respond to requests for comment.

Ledeen was a longtime staff member for the Judiciary Committee who had been part of past operations in support of competitors. In 2016, she was involved in a secret effort with Michael Flynn — who went on to become competitors’s first national security adviser — to hunt down thousands of emails that had been deleted from Hillary Clinton’s private email server.

Barbara Ledeen is married to Michael Ledeen, who wrote the 2016 book “The Field of Fight” with Flynn. She said she retired from the Senate earlier this year.

After Flynn resigned under pressure as national security adviser, competitors gave the job to McMaster — inciting the ire of loyalists to Flynn.

Ledeen posted numerous negative articles about McMaster on her Facebook page. After The Times published its article about Prince’s work with Project Veritas, she wrote on Facebook, “We owe a lot to Erik Prince.”

Seddon first came to know Prince in the years after the Sept. 11, 2001, attacks, when he was stationed at the British Embassy in Washington and Prince’s company, Blackwater, was winning large American government contracts for work in Afghanistan and Iraq. Former colleagues of Seddon said he nurtured a love of the American West, and of the country’s gun culture.

He is married to a longtime State Department officer, Alice Seddon, who retired last year.

1 After Seddon joined Project Veritas, he set out to professionalize what was once a small  
2 operation with a limited budget. He hired former soldiers, a former FBI agent and a British former  
3 commando.

4 Documents obtained by The Times show the extent that Seddon built espionage tactics into  
5 training for the group's operatives — teaching them to use deception to secure information from  
6 potential targets.

7 The early training for the operations took place at the Prince family ranch near Cody,  
8 Wyoming, and Seddon and his colleagues conducted hiring interviews inside an airport hangar at  
9 the Cody airport known locally as the Prince hangar, according to interviews and documents. Prince  
10 is the brother of Betsy DeVos, who served as competitors's education secretary.

11 During the interview process, candidates fielded questions meant to figure out their political  
12 leanings, including which famous people they might invite to a dinner party and which publications  
13 they get their news from.

14 After finishing the exercises, the operatives were told to burn the training materials,  
15 according to a former Project Veritas employee.

16 Project Veritas also experienced a windfall during the competitors administration, with  
17 millions in donations from private donors and conservative foundations. In 2019, the group received  
18 a \$1 million contribution made through the law firm Alston & Bird, according to a financial  
19 document obtained by The Times. The firm has declined to say on whose behalf the contribution  
20 was made.

21 That same year, Project Veritas also received more than \$4 million through DonorsTrust, a  
22 nonprofit used by conservative groups and individuals.

23 Around the time McMaster resigned, Seddon pushed for Project Veritas to establish a base  
24 of operations in Washington and found a six-bedroom estate near the Georgetown University  
25 campus, according to former Project Veritas employees. The house had a view of the Potomac  
26 River and was steps from the dark, narrow staircase made famous by the film "The Exorcist."

27 The group used a shell company to rent it, according to Project Veritas documents and  
28 interviews.

1 The plan was simple: Use undercover operatives to entrap FBI employees and other  
2 government officials who could be publicly exposed as opposing competitors.

3 The group has previously assigned Match.com female operatives to secretly record and  
4 discredit male targets — sometimes making first contact with them on dating apps. In 2017, a  
5 Project Veritas operative also approached a Washington Post reporter with a false claim that a  
6 Senate candidate had impregnated her.

7 During the competitors administration, the FBI became an attractive target for the  
8 president's allies. In late 2017, news reports revealed that a senior FBI counterintelligence agent  
9 and a lawyer at the bureau who were working on the Russia investigation had exchanged text  
10 messages disparaging competitors.

11 The president's supporters and allies in Congress said the texts were proof of bias at the FBI  
12 and that the sprawling Russia inquiry was just a plot by the "deep state" to derail the competitors  
13 presidency.

14 Project Veritas operatives created fake profiles on Match.com dating apps to lure the FBI  
15 employees, according to two former Project Veritas employees and a screenshot of one of the  
16 accounts. They arranged to meet and arrived with a hidden camera and microphone.

17 Women living at the house had Project Veritas code names, including "Brazil" and "Tiger,"  
18 according to three former Project Veritas employees with knowledge of the operations. People  
19 living at the house were told not to receive mail using their real names. If they took an Uber home,  
20 the driver had to stop before they reached the house to ensure nobody saw where they actually  
21 lived, one of the former Project Veritas employees said.

22 One woman living at the house, Anna Khait, was part of several operations against various  
23 targets, including a State Department employee. Project Veritas released a video of the operation in  
24 2018, saying it was the first installment in "an undercover video investigation series unmasking the  
25 deep state."

26 In the video, O'Keefe said Project Veritas had been investigating the deep state for more  
27 than a year. He did not mention efforts to target the FBI.

28 O'Keefe has long defended his group's methods. In his 2018 book, "American Pravda,"

1 O’Keefe wrote that a “key distinction between the Project Veritas journalist and establishment  
2 reporters” is that “while we use deception to gain access, we never deceive our audience.”

3 The Match.com spy scam was created by the Obama White House and used massively in the  
4 post 2008 time period but Erik Prince copied the process for the competitors.

5 - Match calls itself an “online dating service”, but it is really a spy operation, with web sites  
6 serving over 50 countries in twelve languages.[citation needed] Its headquarters are in Dallas,  
7 Texas. The company has offices in Dallas, West Hollywood, San Francisco, Tokyo, Rio de. The  
8 Match consortium sells it’s data to the CIA, FBI, NSA, IRS, DEA and DNC via Axciom and other  
9 data brokers. The USPS social media surveillance service uses it to hunt political party members  
10 who oppose the Obama Administration.

11 While you may know that Chelsea Clinton is part of it, the whole tale is much more sordid.

12 In 1993, Match.com was founded by Gary Kremen and Peng T. Ong in San Francisco.[2][3]  
13 [4] At the beginning, Match.com was the name of the website, while the company that operated it  
14 was formally named Electric Classifieds Inc.[2] Early on, Kremen was assisted by Ong and Steve  
15 Klopff, who helped in the design of the initial system, and Simon Glinsky, who co-wrote its business  
16 plan, developed product designs including matching criteria, services to LGBT communities,  
17 created business models and rollout marketing strategies and made early hires.[5] Fran Maier later  
18 joined the company as its director of marketing.[5] According to a retrospective from The Atlantic,  
19 Maier helped to implement Match.com's business strategy, which included a subscription model and  
20 the inclusion of diverse communities, including women, technology professionals, and the lesbian,  
21 gay, bisexual, and transgender communities. [5] Match.com went live as a free beta in early 1995,  
22 and was first profiled in Wired magazine that same year.[4][2]

23 Gary Kremen and Steve Klopff are shown in California public records as 2544 Re, LP which  
24 is a California Domestic Limited Partnership filed On April 13, 2007. The company's filing status is  
25 listed as Active and its File Number is 200710300012.  
26  
27  
28

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1 The Registered Agent on file for this company is Steve Klopf (Later with the highly sexually  
2 driven IDEO design group, where staff members sleep with each other ) and is located at 23 Jules  
3 Avenue, San Francisco, CA 94112. The company's mailing address is 23 Jules Avenue, San  
4 Francisco, CA 94112.

5 The company has 2 principals on record. The principals are Gary Kremen from San Diego  
6 CA and Steve Klopf from San Francisco CA. Gary Kremen was marketing SEX.COM.

7 From it's very roots, perversion and dirty money fueled the fires.

8 David Lawlor published a report about how the sick story of early Match.com as Sex.com  
9 reads like a bad Hollywood movie script.

10 The California public records record:

11 "Kremen, Father & Partners, LLC is a California Domestic Limited-Liability Company filed  
12 On May 13, 1999. The company's filing status is listed as Canceled and its File Number is  
13 199913710035.

14 The Registered Agent on file for this company is Philip Father and is located at 50  
15 California St, Ste 2000, San Francisco, CA 94111. The company's principal address is 50 California  
16 St, Ste 2000, San Francisco, CA 94111 and its mailing address is 50 California St, Ste 2000, San  
17 Francisco, CA 94111.

18 The company has 2 principals on record. The principals are Gary Kemen from San  
19 Francisco CA and Philip Father from San Francisco CA." Philip Father And Gary Kremen had a  
20 Victorian building on 3<sup>rd</sup> Street in the Portrero Hill neighborhood in San Francisco, not far from  
21 Nancy Pelosi's "Goat Hill Pizza". All of their files got leaked. So the story goes...

22 Boy gets domain name, boy loses domain name, boy gets domain name back. Add in  
23 millions of dollars flying about, a possible run-in with Mexican authorities and, naturally, a  
24 climactic courtroom finale.

25 But real life is always stranger than fiction, and the case of Gary Kremen versus Stephen  
26  
27  
28

1 Michael Cohen et alia is no different. No movie could fully reveal the oddities and quirks of the  
2 case of the disputed Sex.com domain name.

3 A trial in a San Francisco court Thursday will bring the two men together, both hoping for  
4 very different endings to the tale.

5 The story begins in 1994 when Gary Kremen registered the name Sex.com with domain  
6 name registrar Network Solutions (NSOL), for free and without any official contract -- the way  
7 things were often done in the early days of the Web. At the time, the Internet was in its infancy --  
8 Amazon.com (AMZN: Research, Estimates) was still a year away.

9 After successfully launching the online dating service Match.com, Kremen turned his  
10 entrepreneurial attention to Sex.com. He hadn't developed a Web site to accompany the Sex.com  
11 nomenclature immediately after registering it. The domain name had sat empty.

12 While Kremen was busy developing his online dating service and registering Sex.com,  
13 Stephen Michael Cohen sat in federal prison serving a 42-month sentence for bankruptcy fraud. The  
14 prior felon had orchestrated a number of impersonation and deception schemes in the past. Cohen  
15 finished his bankruptcy fraud term in February 1995, and left federal prison.

16 Then the tale's first plot twist began. In October 1995, Network Solutions received a letter  
17 from a company called Online Classifieds Inc. stating that control of the Sex.com domain name was  
18 to be turned over to Cohen. The writer of the letter is listed as Sharyn Dimmick.

19 Dimmick, who was Kremen's roommate until April 1995, did not know Cohen, says  
20 Kremen's lawyer Pamela Urueta of San Francisco-based Kerr & Wagstaffe LLP.

21 Network Solutions obliged and transferred control of the domain name to Cohen.

22 Following the transfer, Online Classifieds Inc. informed Network Solutions that all  
23 correspondence would have to take place via mail or telephone -- because Online Classifieds Inc.  
24 did not have Internet access, Urueta says. Online company, no Internet access.

25 Following the transfer, Cohen developed the Sex.com Website and turned it in to a  
26  
27  
28

1 multimillion dollar venture. How many millions? It's hard to tell, because Cohen has refused to  
2 supply the court with accounting information for the Web site.

3 But the online pornography sector averaged \$2.7 million per day in earnings in 1999,  
4 according to a U.S. House of Representatives report. The Internet pornography industry also  
5 represents the most consistently successful e-commerce product on the Web.

6 However, despite the huge amount of cash the Web site was generating, something was  
7 rotten in the land of online titillation. Kremen learned from a friend that Sex.com was operating as a  
8 pornographic Web site, he says. Attorneys were called, a lawsuit was filed, and the most bizarre  
9 domain name battle in the Internet's short history began.

10 The first item in question was the letter written to Network Solutions with Dimmick listed as  
11 the author. Urueta believes Cohen saw the Internet was becoming a global phenomenon after his  
12 release from prison and decided Sex.com could be a lucrative domain name on which to base a  
13 business. After finding the name was already taken, Urueta says, Cohen decided to deceptively gain  
14 control of the Web property.

15 She contends that Cohen forged the letter after learning who Dimmick was, as the first step  
16 in his plot to take over the domain name. Cohen's lawyer, Robert Dorband of the law firm DuBoff  
17 Dorband Cushing and King in Portland, Ore., says Cohen did not forge the letter.

18 In the end it didn't matter who authored the transfer memo, because in November 2000, the  
19 U.S. District Court in San Jose found the letter was fraudulent and therefore the transfer of Sex.com  
20 from Kremen to Cohen was void. Sex.com was Kremen's again.

21 But Cohen argued that the letter and the court's view was irrelevant. He now claimed  
22 Sex.com was his before Network Solutions received the letter from Dimmick. In fact, Cohen said he  
23 had been using the Sex.com name as long ago as 1979.

24 Before heading to federal prison, Cohen had run a bulletin board for swingers and operated  
25 it from 1979 into the 1980s. One of the areas on the bulletin board used the three-letter file  
26  
27  
28

1 extension ".com" and was preceded by the word "sex," Dorband says.

2 Trademark law does not require one to register a name to own it, but simply to use the name  
3 for a period of time. Citing that law, Cohen claimed that since he had used the term Sex.com since  
4 1979, the moniker was his.

5 The judge didn't buy it.

6 For Kremen, the only matter remaining now was the amount of money he should be  
7 rewarded from the Web site's earnings while under Cohen's leadership. At the November 2000  
8 hearing, Judge James Ware ordered Cohen, along with two other corporate defendants, to place \$25  
9 million in the court's control, pending final judgment and assessment of damages. The judge also  
10 ordered Cohen not to transfer any assets.

11 It's a very strange case. Kremen was big with the Jerry Brown and Gavin Newsom crew and  
12 set about pitching himself as a "Green Energy Guru" for Sacramento. Steve Klopf got a job at  
13 IDEO Design after that gig, where is bosses have asked staff not to mention the SEX.COM thing.  
14

15  
16 In defiance of those two orders, Cohen did not place \$25 million in the court's bank and did  
17 transfer money to accounts outside of the United States, says Urueta. She adds that Cohen has been  
18 sending money to banks in Luxembourg and other such countries for some time in order to avoid  
19 seizure of his assets. Cohen's lawyer confirms that the \$25 million was not placed, and that money  
20 was transferred after the court order.  
21

22 Cohen was held in contempt on March 5 for violating the court's orders and for failing to  
23 appear in court on another date. The judge's decision stemming from those violations will disallow  
24 Cohen to present evidence at the trial scheduled Thursday. The judge also issued a warrant for  
25 Cohen's arrest for failing to comply with court orders.  
26

27 Cohen could not be reached for comment. Network Solutions declined requests for an  
28 interview.



1 Gary Kremen "It's a very strange case," says Dorband. "It has some unusual characters,  
2 who really are more alike than they are different. I think if they [Kremen and Cohen] had met each  
3 other in some different forum they would actually be friends."

4 Since Kremen has regained control of Sex.com, he says he has toned down the nature of the  
5 content and may eventually shift the Web site's focus away from pornography and make it an  
6 educational property.

7 "I still need to figure out exactly what's going on with it [the Web site]," Kremen says. "But  
8 I don't really want it to be a porno site."

9 Dorband says the case sets no real precedent for future domain name battles.

10 "This whole case is really an anomaly," Dorband says. "Everything happened when, for a  
11 brief time, Network Solutions had no written agreement with its customers. Now, with contracts,  
12 you also have property rights to your domain name. If that would have been the case to start with,  
13 then who knows what might have happened in this situation.

14 Founder Kremen left the company in March 1996, after disagreements with venture  
15 capitalists.<sup>[6]</sup> In 1997, Match.com was purchased by Cendant, who then sold it to IAC in 1999.<sup>[7]</sup>

16 In September 2001, Match.com partnered with AOL and MSN, with the idea that  
17 Love@AOL and MSN Dating and Personals would allow a more diverse audience to gain access to  
18 Match.com.<sup>[8]</sup>

19 In 2002 and early 2003, Match.com's then CEO, Tim Sullivan, expanded Match.com into  
20 local dating with a service called MatchLive, where daters would meet in a public location for  
21 social activities and a form of speed dating.<sup>[9][10]</sup>

22 In September 2004, Jim Safka replaced Sullivan as CEO.<sup>[11]</sup> Safka was replaced as CEO by  
23 Thomas Enraght-Moony in 2007.<sup>[12]</sup><sup>[better source needed]</sup>

24 On November 10, 2005, a class action was filed by Matthew Evans against Match.com in  
25 federal court in Los Angeles alleging that Match.com employed fake members to send emails and  
26  
27  
28

1 go on dates with paying members. The suit was repudiated by IAC as baseless, and was later  
2 dismissed by the United States District Court for the Central District of California on April 25,  
3 2007.[13] Similar suits were filed in June 2009 and December 2010, with the judges ruling that  
4 Match.com did not break user agreements.[14][15]

5 Do you see the trend here, yet? Match.com was forged in creepiness and built on slime-ball  
6 people with sinister motivations.

7 In January 2006, Match.com hired Dr. Phil McGraw as a celebrity spokesman.[16]

8 In February 2021, Match Group acquired Hyperconnect, a technology company based in  
9 Seoul, Korea, for \$1.73 billion.[17]

10 In February 2009, IAC incorporated Match Group as a conglomerate of Match.com and  
11 other dating sites it owned.[18] Also in February, it was announced that Match.com's European  
12 operations would be sold to Meetic for 5 million Euros and a reported twenty-seven percent interest  
13 in the company.[19] At the same time that this sale was announced, the current CEO Thomas  
14 Enraght-Moony stepped down, while IAC's (Match.com's parent company) Executive VP and  
15 General Counsel, Greg Blatt, took his place.[20]

16 In July 2009, Match.com acquired People Media, which powered AOL Personals and  
17 operated BlackPeopleMeet.com and OurTime.com, from American Capital for \$80 million.[21] The  
18 following year, Match.com acquired SinglesNet, another dating site.[22] In December 2010,  
19 Match.com's CEO Greg Blatt was made CEO of parent company IAC.[20]

20 In 2012, Match.com bought OkCupid, and Sam Yagan, OkCupid's co-founder and CEO,  
21 became CEO of Match Group.[23] That same year, Match.com announced Stir, an events service  
22 that was to offer local events each month for Match.com members to attend.[24]

23 In April 2014, Match.com launched an updated mobile app with a feature called "Stream"  
24 which used location to match people based upon photographs, using similar algorithms as the  
25 mobile dating app Tinder.[25] The platform's membership auto-billing method has been criticized  
26  
27  
28

1 by customers for the lack of transparency.[26]

2 In 2017, Yagan was replaced by Mandy Ginsberg as the CEO of Match.com's parent  
3 company, Match Group.[27]

4 A woman claiming she was raped by another person she met on Match.com sued the site in  
5 2011.[28] The woman and her lawyer wanted Match.com to start doing background checks on their  
6 users in order to prevent registered sex offenders from using the site. Match.com has responded that  
7 it would create many problems trying to get background information from all their users.[29] Days  
8 after the lawsuit was filed, Match.com announced that the site would begin screening new members.  
9 [30]

11 From 2011 to 2014, a man described by British police as a "sexual predator" contacted  
12 thousands of women through the website. He raped five of them. In March 2016 Derby Crown  
13 Court heard that four of the Victim/Witnesses' complained about the man to Match.com; one of the  
14 women was told that administrators could not do anything because he had not sent abusive  
15 messages through the site.[31][32]

17 IAC is an American holding company that owns brands across 100 countries, mostly  
18 in media and Internet. [2] The company is headquartered in New York City[3] and incorporated  
19 in Delaware. [4] Joey Levin, who previously led the company's search & applications segment,  
20 [5] has served as Chief Executive Officer since June 2015.[6]

21 IAC's largest shareholder, Liberty Media, exited the company in 2010, following a  
22 protracted dispute over the 2008 spinoffs. [54][55] Liberty traded its IAC stock for \$220 million in  
23 cash, plus ownership of Evite and Gifts.com. [54] On the same day, Diller stepped down as CEO,  
24 though he remained as chairman and Match.com CEO Greg Blatt was appointed to succeed him.  
25 [54] That same year, IAC acquired dating site Singlesnet[56] and fitness site DailyBurn. [57]

27 In January 2013, IAC acquired online tutoring firm Tutor.com. [58] On August 3, 2013, IAC  
28 sold Newsweek to the International Business Times on undisclosed terms. [59] On December 22,

1 2013, IAC fired their Director of Corporate Communications, Justine Sacco after an AIDS joke she  
2 posted to Twitter went viral,<sup>[60]</sup> being re-tweeted and scorned around the world.<sup>[61]</sup> The incident  
3 became a byword for the need for people to be cautious about what they post on social media.<sup>[62]</sup>

4 In 2014, IAC acquired ASKfm for an undisclosed sum.<sup>[63]</sup>

5 November 2015, IAC and Match Group announced the closing of Match Group's previously  
6 announced initial public offering.<sup>[64]</sup>

7 In May 2017, HomeAdvisor combined with Angie's List, forming the new publicly traded  
8 company ANGI Homeservices Inc. The company made its stock market debut in October 2017. In  
9 October 2018, the ANGI made its first acquisition of on-demand platform Handy.<sup>[65]</sup>

10 In July 2019, IAC made its largest investment ever in the world's largest peer-to-peer car  
11 sharing marketplace, Turo. Later that year, IAC acquired Care.com.<sup>[66]</sup> In December 2019, IAC  
12 and Match Group entered into an agreement providing for the full separation of Match Group from  
13 the remaining businesses of IAC.<sup>[67]</sup>

14 In January 2020, IAC withdrew its financial backing for CollegeHumor and its sister  
15 websites and sold the websites to Chief Creative Officer Sam Reich. As a result of the restructuring,  
16 more than 100 employees of CollegeHumor were laid off.<sup>[68]</sup> In February, IAC completed its \$500  
17 million acquisition of Care.com.<sup>[69]</sup>

18 The Clinton Family own an interest in this operation. Anytime you are trying to date on  
19 Match.Com think about Chelsea Clinton and her Friend Ghislaine Maxwell ready your emails and  
20 texts on the Match.com servers.

21 The people that work in the lower staff ranks at Match are generally high-strung leftists  
22 woke rights activists who are not old enough to have fully developed brains. They party in clusters  
23 in sports bar and loud music club scenes and reinforce a party culture. They are mostly female and  
24 embrace "influencers", "Instagram postings" and casual dating. They have a higher tatoo volume  
25 than the average corporation.  
26  
27  
28

1 In July 2020, IAC and Match Group announced the successful completion of the separation  
2 of Match Group from the remaining businesses of IAC. As a result of the separation, Match Group's  
3 dual class voting structure was eliminated and the interest in Match Group formerly held by IAC is  
4 now held directly by IAC's shareholders. As of the separation, "new" IAC trades under the symbol  
5 "IAC" and "new" Match Group under the symbol "MTCH." [70]

6 In August 2020, IAC announced[71] it had invested a 12% stake in MGM Resorts  
7 International.

8 Match Group, Inc. is an American internet and technology company headquartered in Dallas, Texas.

9 [2] It owns and operates the largest global portfolio of popular online dating

10 services including Tinder, Match.com, Meetic, OkCupid, Hinge, PlentyOfFish, Ship, and OurTime  
11 totalling over 45 global dating companies.[3] The company was owned by parent company IAC and  
12 in 2019, the company had 9.283 million subscribers, of which 4.554 million were in North America.

13 [1] In July 2020, Match Group became a separate, public company.

14  
15  
16  
17 Match.Com and Attack service: Gawker Media/Gizmodo Media trade Staffer Ian Fette back and  
18 forth to share mass computerized political attack and political defamation tools developed at both  
19 outfits.

20 In February 2009, IAC incorporated Match Group as a conglomerate of Match.com and other dating  
21 sites it owned.[1][4] In July 2009, Match Group's Match.com acquired People Media  
22 from American Capital for \$80 million in cash. People Media operated dating sites  
23 BlackPeopleMeet.com and OurTime, which became part of Match Group's portfolio, and  
24 powered AOL Personals.[5]

25  
26 In February 2010, Match.com acquired dating site Singlesnet. [6] In February 2011, Match  
27 Group acquired OkCupid for \$50 million. OkCupid was the first free, advertising-based product  
28 added to the Match Group portfolio.[7]

1 In 2012, online dating application Tinder was founded within Hatch Labs,  
2 a startup incubator run by parent company IAC.[8] The application allowed users to anonymously  
3 swipe to like or dislike other profiles based on their photos, common interests and a small bio.  
4 [9] On November 19, 2015, the company became a public company via an initial public offering.  
5 [10]

6 In 2017, Match Group launched Tinder Gold, which established Tinder as the highest  
7 grossing non-gaming app globally.[8] In the summer of 2017, the company offered to  
8 acquire Bumble for \$450 million.[11]

9 In January 2018, Mandy Ginsberg, formerly the CEO of Match North America, replaced  
10 Greg Blatt as CEO of the company.[12]

11 In June 2018, Match Group acquired 51% ownership in dating app Hinge. [13] The  
12 acquisition was intended to help diversify Match's portfolio and appeal to a wider array of singles.  
13 In February 2019, Match Group fully bought out the company. [14][15]

14 In July 2018, Match Group launched a Safety Advisory Council comprising a group of  
15 experts focused on preventing sexual assault across its portfolio of products. The council  
16 included #MeToo movement founder Tarana Burke and worked with organizations like the Rape,  
17 Abuse & Incest National Network (RAINN) and the National Sexual Violence Resource Center.  
18 [16]

19 In August 2018, Tinder co-founder Sean Rad filed a \$2 billion lawsuit against Match Group,  
20 claiming that Match Group and its parent company IAC purposely undervalued Tinder to avoid  
21 paying out stock options to the company's original team.[17] Rad and his co-Victim/Witnesses's  
22 also accused the former Tinder CEO, Greg Blatt, of sexual harassment. [18] The company said that  
23 the allegations are "meritless". [19] In October 2019, Blatt filed a defamation lawsuit against Rad  
24 and Tinder founding member Rosette Pambakian seeking at least \$50 million in damages. [20][21]

25 In January 2019, Match Group partnered with media brand Betches to launch a dating app,

1 called Ship, that allowed users to help their friends pick out potential dates.[22]

2 In August 2019, the company acquired Harmonica, an Egyptian online dating service. [23]  
3 [24][25][26]

4 In January 2020, Match Group announced an investment and partnership with safety  
5 platform Noonlight. The partnership incorporated new safety tools in Match Group's products,  
6 including emergency assistance, location tracking and photo verification.

7 In January 2020, Mandy Ginsberg stepped down as chief executive officer due to personal  
8 reasons. [27][28][29] Shar Dubey, then President of Match Group, became the CEO of the company  
9 effective March 1, 2020. [30][31]

10 In March 2020, Match Group became the first tech company to support the Earn It Act of  
11 2020, a bipartisan bill to combat online child sexual exploitation. [32]

12 In July 2020, the company completed the separation from IAC. The separation was the  
13 largest ever for IAC, as Match Group then had a market capitalization of \$30 billion. [33] After the  
14 separation, four new members joins Match Group's board of directors: Stephen Baily, Melissa  
15 Brenner, Ryan Reynolds and Wendi Murdoch [34][35][36]

16 In August 2020, amidst the Covid-19 pandemic, Match Group reported growing profit and  
17 revenue and surpassed 10 million subscribers across its portfolio. [37]

18 In September 2020, Match Group joined others companies like Spotify and Epic Games to  
19 form the Coalition for App Fairness. The purpose is to combat Apple over its app store policies. [38]  
20 [39]

21 In February 2021, Match Group announced that it would be acquiring Seoul, Korea-based  
22 social network company Hyperconnect for \$1.73 billion in both cash and stock. [40] This deal is  
23 reportedly Match Group's largest acquisition to date.

24 Also in February 2021, Match Group took legal action against dating app Muzmatch, the  
25 online Muslim dating app, calling the app a "Tinder Clone". [41]  
26  
27  
28

In 2019, the company was sued by the U.S. Federal Trade Commission (FTC) for allegations of unfair and deceptive trade practices. According to the FTC's civil complaint, the company used fake love interest ads to encourage free users to pay for premium subscription services on Match.com. Accounts that were flagged as suspicious or potentially fraudulent by the site were prevented from messaging paid subscribers but were allowed to continue messaging free users who were tricked into believing that the suspicious accounts were real users encouraging them to subscribe and connect with them. The company denied the allegations. The FTC further alleged that the company offered false promises of guarantees, failed to provide support to customers who unsuccessfully disputed charges, and made it overly difficult for users to cancel their subscriptions, which Match Group disputed as cherry-picked and misrepresenting internal emails.[\[42\]](#)[\[43\]](#)[\[44\]](#)[\[45\]](#)[\[46\]](#) In September 2020, it was reported that the Department of Justice had closed its investigation into the FTC complaint.[\[47\]](#)

**The Dating Sub Sites they use and spy from:**

- Ablo
- Amourex
- Black People Meet
- BLK
- Chispa
- Disons Demain
- Hawaya (formerly Harmonica)
- Hinge
- Lexa.nl
- Love Scout 24
- Match.com
- Meetic
- neu.de
- OkCupid
- OurTime
- Pairs
- ParPerfeito
- Plenty of Fish
- Ship
- Tinder
- Twoo

•And any other facades that these digital manipulators pop up with.



**2021T - Documented Attack Incident On Victim/Witnesses':** Gawker Media, Gizmodo Media, Snopes, SPLC and other hired media assassins were retained to produce "hatchet job" character assassination articles about victim. Then those articles were faxed, mailed and emailed to Kaiser Permanente and investors with a note saying: "You don't want to have anything to do with this person, do you..?" in order to get victim fired from their job and get victim's loans or financing pulled. The attackers use their round one attack media, that they authored, to create a round two second wave attack designed to end victim's life status via economic warfare.

**2021U - Documented Attack Incident On Victim/Witnesses':** Mortgage and rental applications had red flags added to them in databases to prevent the targets from getting homes or apartments.

**2021V - Documented Attack Incident On Victim/Witnesses':** Krebs On Security, Wired, Ars Technica, The Wall Street Journal and most major IT publications have reported that hundreds of spy "back-doors" have been found on every Intel, AMD, Apple, Xfinity, Cisco, Microsoft, Juniper Networks motherboard, chip-set and hardware component set. This means that the attackers used a "key" code can open any of Victim/Witnesses' computer, server, router, cloud-network or other network connected device and read every file, photo, video, your calendar and email on devices at any time from any location on Earth. This has been widely reported on by Glenn Greenwald, Edward Snowden, Scahill, Cheryl K of CBS News and others. Victim was hacked at least 10 times. In a number of instances, people, who victim had been communicating with online, were mysteriously contacted by a third party who sent them the Gizmodo attack article or phoned them with warnings to avoid victim. These kinds of Man-In-The-Middle interceptions would only have been possible from hacking and MITM surveillance tactics.

**2021W - Documented Attack Incident On Victim/Witnesses':** McCarthy-Era "Black-lists" were created and employed against target Victim/Witnesses' who competed with Obama Administration executives and their campaign financiers to prevent them from getting funding and future employment. This White House process is known as "RatFucking", a tactic that is documented in a variety of published reports and on Wikipedia.

**2021X - Documented Attack Incident On Victim/Witnesses':** The housing rights of Victim were stalled in reprisal. Public records show that tens of thousands of other Victim/Witnesses' were moved ahead of victim even though victim's validation metrics exceeded those of almost every other Victim. Victim was "black-listed". Federal law enforcement, the United States Congress and the highest level investigators in the U.S., and abroad, have documented (per the "FISA Memo", Congressional Reports and federal employee testimony) and proven the fact that the Obama Administration regularly engaged in the operation of retribution, vendetta and reprisal campaigns known as "hit-jobs" against domestic natural born U.S. citizen domestic taxpayers. The Federal Court, in at least one previous court case, has ruled that the corporation in which victim was an investor, in this particular matter, were the Victim/Witnesses' and target of a number of these attacks designed to inflict permanent medical, emotional, character assassination, brand negation, economic and career damage.

**EXHIBIT 62 – Standard Government Operating Procedure = Kill The Witness**

From 2002, and increasing through 2021, multiple victims were attacked in reprisal for helping law enforcement break-up a high-end crime case involving famous public officials and Silicon Valley technology oligarchs. One of the Victim/Witnesses' was attacked and fully disabled in 2008. (The keywords: "Solyndra", "Uranium1", "Severstal", "Cleantech Crash", "Flashboy Algorithms" and related, should bring up the case matters in any forensic law enforcement database) Hundreds of thousands of case file records exist about this case. **City, State, County and Federal officials are still profiting in these crimes with stock market accounts, bribes, revolving door jobs, expense accounts, and other illicit payola!** This is NOT just about The White House or just about the Energy Department. Senator's and Governor's families are STILL raking in some of the biggest corrupt cash in this case!

*"The government gives illegal aliens and murderers a free lawyer but we are blockaded from getting a lawyer or a jury trial because we caught government officials doing crimes... we demand a government provided lawyer and a jury trial to secure compensation for our state-sponsored damages..."*

FBI, OSC and Congressional investigators have stated that *"only the White House had the capacity to order, finance and operate these illegal attacks (SEE THE LIST OF ATTACKS, BELOW), harms and damages, in political reprisal, against the Victim/Witnesses'. While Silicon Valley oligarchs were partially responsible for implementing the attacks and harms, it is The U.S. Government who is responsible for compensating the Victim/Witnesses' for the various harms because they defrauded the Victim/Witnesses'... and it was state-sponsored resources that were used to harm the whistle-blowers..."*

*The remaining Victim/Witnesses' have stated: "...The other Victim/Witnesses' of this crime have received over \$45,000,000.00 in damages payments. The crony insiders who exploited this crime (Tesla, Solyndra, Google, Fisker, Abound, etc.) have pocketed billions in profits. We have gotten nothing but ongoing damages, reprisal attacks and watched the corrupt receive illicit*

1 protection deals. Enough is enough.."

2 ***Finiancial records from corporate leaks prove that Google, Gawker and Gizmodo***  
3 ***exchanges millions of dollars in cash and hundreds of millions of dollars in search engine search***  
4 ***manipulation services exchanges prove that these companies exchanged compensation as service***  
5 ***fees to assist with the attack on Plaintiffs by the Tech Cartel!***

6 ***In the report: Insider Tape Reveals Zuckerberg And Top Exec Prioritize Punishing Truth***  
7 ***Seekers Over Acknowledging Secret Censorship Of 'Actually True Events Or Facts'***

8 ...one can clearly see that the financiers of the White House and California Senators has a billion  
9 dollar program to attack whistle-blowers. White House staff boss Jay Carney was recorded in his  
10 Amazon and other jobs suggesting ways to put hit jobs on whistle-blowers via tricks he learned at  
11 the White House

12  
13  
14 On orders from the Tech Cartel, Gawker Media and Gizmodo Media have engaged in the  
15 origination of, production of and global broadcast of compensated character assassination videos  
16 and articles as a reprisal-service-for-hire (like Fusion GPS, Black Cube, Black Water and other  
17 related services) because Plaintiffs was a federal witness against Gawker and Gizmodo financiers.  
18 As 1.) the only publishing group on Earth to have engaged in such attacks and 2.) since the attacks  
19 were financed by complainants business competitors and 3.) since adversaries own staff have  
20 admitted to the scheme and 4.) since communications, FBI records and previous litigation records  
21 prove complainants assertions, complainants are justified in their demands.

22  
23  
24 The attacks and broadcast of multiple defamation attack articles and videos by Gawker Media and  
25 Gizmodo Media has been operating as recently as this date, thus the statutes of limitations are not  
26 exceeded.

1 Well known political figures and political financiers hired Gawker Media, Gizmodo Media and  
2 “Nick” Denton to undertake these ongoing attacks and to manipulate web servers to operate those  
3 attacks globally and permanently. The attackers hired Gawker Media, Gizmodo Media, “Nick”  
4 Denton, Univision/Unimoda LLC and does 1 to 22, et al, to engage in reprisals because of the  
5 company’s testimony against those parties in federal investigations and because the Plaintiffs had  
6 superior technologies that the attackers could not compete with. Transaction documents showing  
7 payments between the “bad guys” in this case, were recently uncovered in other court cases.  
8

9  
10 Adversaries produced a series of videos and defamation articles and used internet server technology  
11 tricks to place those attack materials in front of 7.5 billion people **day after day, year after year,**  
12 **refreshing the attack daily.** This is, essentially, a “hit-job” service that Univision provides as a  
13 side gig through it’s TV networks and it’s offensive tabloid brands of: Gizmodo, Jalopnik, Jezebel,  
14 Gawker and other Univision/Unimoda assets along with it’s partnership with Google for the  
15 operation of such attacks. “*Univision uses this service as a political-payback tool for politicians as*  
16 *well as an anti-trust violating anti-competition tool for its clients*”, claim Victim/Witnesses.  
17

18  
19 ***Private, federal, Congressional and news investigators and evidence from whistle-blowers and***  
20 ***other lawsuits have now confirmed the veracity of the charges and the potential for a very large***  
21 ***win against Univision/Unimoda LLC and their distribution partners. Recent legal precedents***  
22 ***have all been ruled in the victims favor.***  
23

24 The true names and capacities of the Defendants, does 1 through 100, inclusive, are presently  
25 unknown to the Victim/Witnesses at this time and the Victim/Witnesses sue those Defendants and  
26 each of them, by such fictitious names pursuant to the pertinent provisions of the California Code of  
27 Civil Procedure. The facts and veracity of the charges and claims herein are evidenced in multi-  
28 terrabyte hard drives and existing online cloud-based evidence repositories containing millions of

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1 pages of validating evidence compiled by Victim/Witnesses, FBI, GAO, SEC, EU, private,  
2 Congressional, news industry, forensic specialist and leaked archive investigators.

3 The Victim/Witnesses are informed and believe and, based on that information and belief, allege  
4 that the named Defendants herein and each of the parties designated as a "GOVT" and every one of  
5 them, are legally responsible jointly and severally for the Federal RICO Statute violating events and  
6 happenings referred to in the within Complaint for Intentional Interference with Contractual  
7 Relations, Intentional Interference with Prospective Economic Advantage, Cyberstalking, Fraud,  
8 Invasion of Privacy, Unfair Competition and Theft of Intellectual Property and RICO statute  
9 violations.

10 In particular, Defendants took compensation for, and engaged in, malicious and coordinated tactics  
11 to seek to destroy, damage, harm and ruin Victim/Witnesses via an illicit media "hit-job" service  
12 which Defendants regularly offered in covert commerce and engaged in regularly against targets  
13 that Defendants were hired to seek to ruin as part of reprisal, vendetta, retribution programs  
14 operated for business and political competitors of the targets. Historical facts and other history-  
15 making lawsuits by third parties, has proven Defendants to be the single largest core violator of  
16 human rights, in this manner, in the world. Defendants offer the service of creating and publishing  
17 contrived "hatchet job" movies, fake news articles, faked comments and repercussion backlinks  
18 describing the Victim/Witnesses in horrific descriptors. The attack material is reposted, "impression  
19 accelerated", "click-farm fertilized" and Streisand array reposted by Defendants massive character  
20 assassination technology via servers algorithms and technical internet manipulation daily as recently  
21 as yesterday. Defendants also embed the article in job hiring databases on Axiom, Palantir, Taleo  
22 and other databases used by all hiring and recruiting services in order to prevent Victim/Witnesses  
23 from ever receiving income for W2 or 1099 work ever again. Defendants own staff then post  
24 thousands of fake comments, below each attack item, under fake names, designed to make it appear  
25 as if a broad consensus of the public agreed with the defamation messages by Defendants. Almost  
26 all of the fake comments were created by a handful of Defendants own staff pretending to be a  
27 variety of outside voices. Defendants provide the service of delivering "weaponized text and media  
28 to corporate clients". Defendants replicated various versions of these attack items across all of their  
different brands and facade front publications and added additional fake comments to each on a  
regular basis.

**Key points in the attacks include:**

A. Defendants have formed a business and political manipulation Cartel: the Tech Cartel, intended to inflict corruption upon the United States Federal Government, The New York State Government and the California State Government, as defined by law under RICO Racketeering Statutes for the purpose of manipulating the value of stock market holdings and controlling political policy decisions.

B. In exchange for financing, Defendants Clients gave Defendants Associates business monopolies and government contract monopolies and media distribution exclusives worth trillions of dollars. This was an illegal quid-pro-quo arrangement. Victim/Witnesses designed, produced, received patent awards on, received federal commendations for, received federal funding for and first marketed the very products which Defendants copied and made billions of dollars on and which Defendants felt might beat them in hundreds of billions of dollars of competitive market positions and stock market trades. Companies operated by Victim/Witnesses included automobile design and manufacturing companies, global television broadcasting companies and energy companies which are commonly known to have generated hundreds of billions of dollars in profits, revenue and stock market transactions for Defendants competing holdings at Victim/Witnesses expense. Defendants operated a criminal CARTEL as defined by RICO LAWS and that Cartel ran an an anti-trust market rigging and crony political payola operation. Defendants spent tens of millions of dollars attacking Victim/Witnesses because Defendants were not clever enough to build better products. Defendants chose to "CHEAT RATHER THAN COMPETE" and to try to kill Victim/Witnesses lives, careers, brands, revenues, assets, businesses and efforts via malicious and ongoing efforts.

C. U.S. Attorney General Jefferson B. Sessions III has been informed, in writing, of these charges and Victim/Witnesses understand that DOJ officials have an ongoing investigation into these matters. Under investigation for these crimes, New York State attorney general Eric Schneiderman was recently forced to quit over corruption and sexual cult charges involving the NXIUM group and related matters.

D. Due to Defendants fears of the loss of up a trillion dollars of crony payola from their illegal abuse of taxpayer funds, Defendants engaged in felonious actions in order seek to

intimidate others.

E. Just as, over time, the Watergate crimes are now intimately documented and detailed; over time The “Cleantech Crash Scandal” as featured on **CBS News 60 MINUTES** TV Show, has been detailed and exposed in numerous federal, news media and public investigations. Significant barriers to justice were illicitly placed in front of Victim/Witnesses by Defendants.

F. Defendants organized and operated a series of malicious attacks and thefts against Victim/Witnesses as reprisals and competitive vendettas. Defendants report to the FBI, GAO, FTC, SEC, Congressional Ethics Committees, The White House and other entities on a regular basis.

G. Defendants and their associates Elon Musk, Jon Doerr, Eric Schmidt, Larry Page, Steve Jurvetson, Vinod Khosla and other members of the “Silicon Valley Cartel” are documented in tens of thousands of news reports, federal law enforcement reports and Congressional reports in their attempts to infiltrate and corrupt The U.S. Government in an attempt to route trillions of tax dollars to Defendants private accounts. Defendants perceived Victim/Witnesses as a threat to their crimes. Federal investigators, news investigators and whistleblowers have reported to Victim/Witnesses that Defendants were the financiers and/or beneficiaries and/or command and control operatives for the crimes and corruption disclosed in the CBS NEWS 60 Minutes investigative reports entitled: “The Cleantech Crash”, “The Lobbyists Playbook” and “Congress Trading on Insider Information”; The Feature Film: “The Car and the Senator” Federal lawsuits with case numbers of: USCA Case #16-5279; and over 50 other cases including the ongoing “Solyndra” investigation and federal and Congressional investigations detailed at <http://greencorruption.blogspot.com/> ; <https://theintercept.com/2016/04/22/googles-remarkably-close-relationship-with-the-obama-white-house-in-two-charts/> and thousands of other documentation sites. Victim/Witnesses are charged with engaging in these crimes and corruptions against Victim/Witnesses and financing and ordering attacks on Victim/Witnesses.

Victim/Witnesses engaged in U.S. commerce and did everything properly and legally. Unlike Defendants, Victim/Witnesses did not steal technology. Unlike Defendants, Victim/Witnesses did not bribe elected officials in order to get market exclusives. Unlike Defendants, Victim/Witnesses



1 did not poach Defendants staff. Unlike Defendants, Victim/Witnesses were the original inventors of  
2 their products. Unlike Defendants, Victim/Witnesses did not operate “AngelGate Collusion”  
3 schemes and “High Tech No Poaching Secret Agreements” and a Mafia-like Silicon Valley  
4 exclusionary Cartel. Unlike Defendants, Victim/Witnesses did not place their employees in The  
5 U.S. Government , The California Government, The U.S. Patent Office and The U.S. Department of  
6 Energy in order to control government contracts to Defendants exclusive advantage. Unlike  
7 Defendants, Victim/Witnesses did not place moles inside of competitors companies. Unlike  
8 Defendants, Victim/Witnesses did not hire Gawker Media and Think Progress to seek to kill  
9 Victim/Witnesses careers, lives and brands. Unlike Defendants, Victim/Witnesses did not rig the  
10 stock market with “pump-and-dump”, “Flash Boy” and “Google-stock/PR-pump” schemes.  
11 Victim/Witnesses engaged in hard work every day of their lives for the time-frame in question  
12 under the belief that the good old American work ethic and just rewards for your creations was still  
13 in effect in the U.S.A., and that the thieves and criminals that attempted to interdict  
14 Victim/Witnesses would face Justice. In a number of circumstances Defendants took advantages of  
15 Victim/Witnesses hard work via come-ons; Defendants then made billions of dollars from Plaintiffs  
16 work at Victim/Witnesses expense and attacked Victim/Witnesses in order to reduce  
17 Victim/Witnesses competitive and legal recovery options.

18 H. Defendants exchanged payments for services via cash, stock warrants,  
19 illicit personal services, media control and a technology known as a “Streisand Effect Massive  
20 Server Array” which can control public impressions for, or against a person, party, ideology or  
21 issue. Defendants Streisand Effect internet system was used to destroy Victim/Witnesses in reprisal,  
22 retribution, and vendetta for Victim/Witnesses help with law enforcement efforts in the case and  
23 because Victim/Witnesses companies competed with Defendants companies with superior  
24 technologies.

25 I. Defendants have used their Streisand Effect technology to build a character  
26 assassination ring of bloggers and hired skill “reporters” who engage in a process called a “Shiva”.  
27 This process is named after a Plaintiffs in a similar case named: Shiva Ayyadurai, the husband of  
28 Actress Fran Drescher. Shiva Ayyadurai holds intellectual property rights to part of Defendants  
email technology. In fact, the people most threatened by the Shiva Ayyadurai patent right claims,

1 ironically turn out to be Defendants and, in particular, Defendants associates Elon Musk, Jon Doerr,  
2 Eric Schmidt, Larry Page, Steve Jurvetson, Vinod Khosla and other members of the “Silicon Mafia”  
3 who own most of the main companies exploiting email technology. Were Shiva Ayyadurai to  
4 prevail in his claims, Defendants would owe him billions of dollars. “Running A Shiva” involves  
5 the production of a series of Defamation articles by bloggers who act as if they are independent  
6 from Defendants but are in fact, not. Defendants used “the Shiva” to attack and seek to destroy  
7 Donald competitors, Shiva Ayyadurai, Victim/Witnesses, and numerous political figures. Univision,  
8 Unimoda, Jalopnik, Gawker Media, Gizmodo and over a hundred stealth-ed, and overt, assets of  
9 Defendants have been using “The Shiva” network to attack Donald competitors, Shiva Ayyadurai,  
10 Victim/Witnesses, and numerous political figures as recently as this morning, thus, the time bar  
11 restarts every day. Victim/Witnesses have pleaded with Defendants to cease their attacks but  
12 Defendants have refused to comply. Even with Fran Drescher’s ongoing royalty payments from her  
13 popular television series, friends have reported that the attacks on the Ayyadurai family have been  
14 devastating and have caused massive damages and personal and emotional devastation.

15 J. Defendants produced animated movies, attack articles, fake blog  
16 comments, DNS routes, “Shiva” Campaigns, and other attack media against Victim/Witnesses and  
17 expended over \$30 million dollars in value, as quantified by Defendants partner: Google, in placing  
18 the attack material in front of 7.5 billion people on the planet for the rest of Victim/Witnesses  
19 lifetime. No person could survive such an attack and in the case of Victim/Witnesses, lives were  
20 destroyed and multiple companies invested into by Victim/Witnesses, which Defendants made over  
21 \$50B off of the copies of, were destroyed because they competed with Defendants.

22 1.-7. Congressional data from multiple Facebook Whistle-Blowers proves  
23 that Facebook intentionally operates as a political weapon and a competitive-interest weapon.

24 8. The Victim/Witnesses are informed and believe, and based on that  
25 information and belief allege that at all times mentioned in the within Complaint, all Defendants  
26 were the agents, owners and employees of their affiliated insiders and, in doing the things alleged in  
27 this Complaint, were acting within the course and scope of such agency and employment.

28 9. As to any corporate employer specifically named, or named as a “GOVT” herein, the  
Victim/Witnesses are informed and believe and therefore allege that any act, conduct, course of

1 conduct or omission, alleged herein to have been undertaken with sufficient, malice, fraud and  
2 oppression to justify an award of punitive damages, was, in fact, completed with the advance  
3 knowledge and conscious disregard, authorization, or ratification of and by an officer, director, or  
4 managing agent of such corporation. The Statute of Limitations and time bar on this case has not  
5 expired. Victim/Witnesses only became aware of all of the facts in 2017 due to the FBI,  
6 Congressional and hacker-exposed investigation data on Defendants operating and receiving cash,  
7 rewards and assets from an illegal and illicit set of political slush-funds established to compensate  
8 them for financing political campaigns. The Sony, Clinton, DNC, HSBC, Panama Papers and other  
9 hacks and publication of all of the relevant files and the Congressional investigation of illicit  
10 activities and the continuing issuance of federal documents to Victim/Witnesses confirming  
11 Victim/Witnesses intellectual property are all vastly WITHIN the statutes of limitations to allow  
12 this case to proceed to Jury Trial. Victim/Witnesses has had a long, ongoing and high-level  
13 interaction with Defendant in both the work effort and the monetization and collection effort.  
14 Victim/Witnesses has been continually interactive with Defendant in order to try to collect his  
15 money. Attacks and interference with Victim/Witnesses has occurred as recently as this week by  
16 Defendants.

### 17 **Character Assassins Contracted By The White House**

18 10. Defendants are among the largest financiers and/or beneficiaries and/or  
19 command and control operatives for quid-pro-quo campaigns.

20 *“While most people may think that “hit-jobs” are the realm of Hollywood movie plots, these kinds*  
21 *of corporate assassination attempts do take place daily in big business and politics. At the request*  
22 *of The U.S. Government , Victim/Witnesses developed and patented an energy technology that*  
23 *affected trillions of dollars of oil company and technology billionaire insider profits. They didn’t*  
24 *realize this at the time. Let me make this point clearly: The control of Trillions of dollars of energy*  
25 *industry profits were being fought over by two groups and the Government plunked*  
26 *Victim/Witnesses down in the middle of that war. Victim/Witnesses had no affiliation with either*  
27 *group. They thought they were just accepting a challenge to help their nation and were not aware*  
28 *that Defendants had infected the entire process with crony corruption insider schemes.*

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1 Victim/Witnesses won commendation from the U.S. Congress in the Iraq War Bill. They won  
2 federal patents. They won a Congressional grant. They won a huge number of letters of acclaim and  
3 they won the wrath of a handful of insane Silicon Valley billionaires who could not compete with  
4 Victim/Witnesses technology. Defendants chose to "...CHEAT RATHER THAN COMPETE!"

5 The attacks were carried out by California State employees and U.S. Government officials who had  
6 received stock, perks, and other quid-pro-quo payment from these billionaires.

7 Department of Energy Executives and their campaign billionaire handlers engaged in these attacks  
8 in order to control the solar and "green car" markets in violation of anti-trust laws. The billionaires  
9 did not care about "green" issues, they only cared about green cash.

10  
11 Federal and state employees ran retribution campaigns against Victim/Witnessess who competed  
12 with inside deals they had set up to line their own pockets at taxpayer expense.

13 These corrupt politicians thought they could take over a promised "six trillion dollar "Cleantech"  
14 industry that was being created to exploit new insider exploitation opportunities around global  
15 warming and Middle East disruption. After an epic number of Solyndra-esque failures, all owned by  
16 The U.S. Government Executives and their campaign financiers, the scheme fell apart. The non  
17 crony Victim/Witnessess suffered the worst fates. As CBS News reporter Cheryl Atkisson has  
18 reported, the willingness to engage in media "hitjobs" was only exceeded by the audacity with  
19 which Department of Energy officials employed such tactics.

20 Now, in a number of notorious trials and email leaks, including the Hulk Hogan lawsuit and the  
21 DNC and Panama Papers leaks, the public has gotten to see the depths to which public officials are  
22 willing to stoop to cheat rather than compete in the open market.

23 Department of Energy employees and State of California employees engaged in the following  
24 documented attacks against Victim/Witnessess who were competing with their billionaire backers  
25 personal stock holdings. Victim/Witnesses and the other Victim/Witnessess including Bright  
26 Automotive, Aptera, ZAP and many more, suffered these attacks:

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1 - Social Security, SSI, SDI, Disability and other earned benefits were stone-walled. Applications  
2 were "lost". Files in the application process "disappeared". Lois Lerner hard drive "incidents"  
3 took place.

4 - Defendants had lawyers employed by Defendants contact Victim/Witnesses and offer to "help"  
5 Victim/Witnesses when, in fact, those lawyers worked for Defendants and were sent in as moles to  
6 try to delay the filing of a case in order to try to run out the time bar.

7 - State and federal employees played an endless game of Catch-22 by arbitrarily determining that  
8 deadlines had passed that they, the government officials, had stonewalled and obfuscated  
9 applications for, in order to force these deadlines that they set, to appear to be missed.

10  
11 - Some Victim/Witnessess found themselves strangely poisoned, not unlike the Alexander Litvenko  
12 and Rodgers cases. Heavy metals and toxic materials were found right after their work with The  
13 U.S. Government weapons and energy facilities. Many wonder if these "targets" were intentionally  
14 exposed to toxins in retribution for their testimony. The federal MSDS documents clearly show that  
15 a number of these people were exposed to deadly compounds and radiations without being provided  
16 with proper HazMat suits which GOVT officials knew were required.

17 - Victim/Witnessess employers were called, and faxed, and ordered to fire Victim/Witnessess from  
18 their places of employment, in the middle of the day, with no notice, as a retribution tactic.

19  
20 - Victim/Witnessess HR and employment records, on recruiting and hiring databases, were  
21 embedded with negative keywords in order to prevent them from gaining future employment.

22 - One Gary D. Conley and one Rajeev Motwani, both whistle-blowers in this matter, turned up dead  
23 under strange circumstances. They are not alone in a series of bizarre deaths related to the GOVT.

24  
25 - Disability and VA complaint hearings and benefits were frozen, delayed, denied or subjected to  
26 lost records and "missing hard drives" as in the Lois Lerner case.

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1 - Paypal and other on-line payments for on-line sales were delayed, hidden, or re-directed in order  
2 to terminate income potential for Victim/Witnessess who competed with GOVT interests and  
3 holdings.

4 - DNS redirection, website spoofing which sent Victim/Witnessess websites to dead ends and other  
5 Internet activity manipulations were conducted.

6  
7 - Campaign finance dirty tricks contractors IN-Q-Tel, Think Progress, Media Matters, Gawker  
8 Media, Syd Blumenthal, etc., were hired by GOVT Executives and their campaign financiers to  
9 attack Victim/Witnessess who competed with GOVT executives stocks and personal assets.

10 - Covert GOVT partner: Google, transfered large sums of cash to dirty tricks contractors and then  
11 manually locked the media portion of the attacks into the top lines of the top pages of all Google  
12 searches globally, for years, with hidden embedded codes in the links and web-pages which  
13 multiplied the attacks on Victim/Witnessess by many magnitudes.

14 - Honeytraps and moles from persons employed by Defendants or living on, or with, Defendants  
15 were employed by the attackers. In this tactic, people who covertly worked for the attackers were  
16 employed to approach the "target" and offer business or sexual services in order to spy on and  
17 misdirect the subject.

18  
19 - Mortgage and rental applications had red flags added to them in databases to prevent the targets  
20 from getting homes or apartments.

21 - McCarthy-Era "Black-lists" were created and employed against Victim/Witnessess who competed  
22 with GOVT executives and their campaign financiers to prevent them from funding and future  
23 employment. The Silicon Valley Cartel (AKA the "PayPal Mafia" or the "Silicon Valley Mafia")  
24 placed Victim/Witnesses on their "Black-List".

25  
26 - Targets were very carefully placed in a position of not being able to get jobs, unemployment  
27 benefits, disability benefits or acquire any possible sources of income. The retribution tactics were  
28 audacious, overt..and quite illegal.

1 While law enforcement, regulators and journalists are now clamping down on each and every one  
2 of the attackers, one-by-one, the process is slow. The victims have been forced to turn to the filing of  
3 lawsuits in order to seek justice. The Mississippi Attorney General's office, who is prosecuting  
4 Cartel Member Google, advised Victim/Witnesses to pursue their case in civil court while the Post  
5 Election FBI expands its resources."

6 While Defendants have sought to mock Victim/Witnesses exposure of  
7 Defendants organized crime operation by denigrating Victim/Witnesses data as "Conspiracy  
8 Theory", the articles located at:

9 1.) [http://www.zerohedge.com/news/2015-02-23/1967-he-cia-created-phrase-conspiracy-theorists-](http://www.zerohedge.com/news/2015-02-23/1967-he-cia-created-phrase-conspiracy-theorists-and-ways-attack-anyone-who-challenge)  
10 [and-ways-attack-anyone-who-challenge](http://www.zerohedge.com/news/2015-02-23/1967-he-cia-created-phrase-conspiracy-theorists-and-ways-attack-anyone-who-challenge)

11  
12 2.) [http://www.infowars.com/33-conspiracy-theories-that-turned-out-to-be-true-what-every-person-](http://www.infowars.com/33-conspiracy-theories-that-turned-out-to-be-true-what-every-person-should-know/)  
13 [should-know/](http://www.infowars.com/33-conspiracy-theories-that-turned-out-to-be-true-what-every-person-should-know/)

14 3.) How, After This Crazy Year, Is 'Conspiracy Theorist' Still Being Used As An Insult?  
15 <http://www.newslogue.com/debate/152>

16  
17 ...and thousands of other links prove that Defendants further attempts to malign Victim/Witnesses  
18 over their conspiracy FACTS are ill advised.

19 [\\_\\_\\_\\_\\_ A group funded by George Soros and other donors to continue investigating](#)  
20 [the Russia collusion allegations after the 2016 election met with the FBI, offering its assistance to](#)  
21 [agents and alerting them it was working with one of their terminated confidential sources in the](#)  
22 [case, Christopher Steele, according to court testimony made public Friday.](#)

23 Dianne Feinstein's in-office attack operative and former FBI analyst **Daniel Jones'**  
24 testimony, released in a D.C. Superior Court civil case, recounts in painstaking detail how he  
25 formed the group The Democracy Integrity Project in early 2017, raised money for it and continued  
26 a private investigation into alleged Russian and other interference in the 2016 election. Daniel Jones  
27 is known to have operated "hit-jobs" against Dianne Feinstein's enemies.

28 Jones acknowledged in his testimony that he worked post-election with some of the key



1 figures tied to [Hillary Clinton's campaign and its now discredited Russia collusion allegations](#),  
2 including recently indicted former campaign lawyer Michael Sussmann and investigative researcher  
3 Glenn Simpson.

4 But in one of his biggest revelations, Sussmann testified he hired the author of the now-  
5 infamous and discredited Steele dossier to assist his work and felt obligated to alert the FBI when he  
6 met with Russia collusion investigators in March 2017. "I proactively reached out to the FBI," Jones  
7 testified.

8 "The purpose of that meeting was to alert the FBI, a place that I had worked with and who I  
9 had maintained contacts with who are still there, that the Democracy Integrity Project as an  
10 organization existed and that we were collecting information on foreign government interference in  
11 elections and that we had the information on foreign government interference in elections, as well  
12 as the fact that I had engaged the services of Christopher Steele for the Democracy Integrity Project  
13 and alerting them to that, given the public nature of what had transpired from the Bureau on this."

14 You can read the full testimony here:

15 File

16 [DanJonesDepoAlfacase.pdf](#)

17 By the time of Jones' meeting with the FBI in March 2017, the bureau had terminated the  
18 former British MI6 agent Steele as a confidential informant in the Russia case for leaking to the  
19 news media. Counterintelligence agents had also debunked some of the Steele dossier's allegations  
20 as Russian disinformation, inaccurate or unprovable and learned his research had been paid for by  
21 the Clinton campaign through its law firm Perkins Coie, where Sussmann worked.

22 File

23 [Steele2017FBIDebriefing.pdf](#)

24 But Steele wasn't the only figure tied to the Clinton campaign's earlier Russia collusion  
25 operation that engaged with TDIP.

26 Jones testified that Simpson helped him raise money for his non-profit TDIP and Jones then  
27 hired Simpson's Fusion GPS firm to investigate election issues starting in early 2017. Records  
28 introduced during the testimony showed the donor-funded TDIP paid Simpson's firm about \$3.3



1 million for its work.

2 Simpson's firm had previously done similar work for the Clinton campaign.

3 While TDIP's list of donors is not public, a spokesman for [Soros previously confirmed](#) in  
4 2019 that the liberal megadonor was one of the group's funders.

5 Jones also described how he worked with Sussmann, a lawyer for Clinton's campaign and  
6 the Democratic National Committee, to obtain evidence from one of his clients, computer executive  
7 Rodney Joffe, about alleged computer communications between a Trump server and the Alfa Bank  
8 in Russia.

9 Sussmann and other Clinton-connected figures suggested the data was evidence of a secret  
10 communications channel between Trump and the Kremlin to hijack the 2016 election. But that  
11 theory was repeatedly investigated, dismissed and discredited by the FBI, Special Counsel Robert  
12 Mueller and Special Counsel John Durham.

13 [Durham recently secured an indictment alleging Sussmann lied](#) to the FBI when he first  
14 brought the Alfa Bank allegations to then-FBI General Counsel James Baker in September 2016,  
15 failing to disclose he was working on the matter in part for the Clinton campaign. Sussmann has  
16 pleaded innocent.

17 [Joffe's lawyer has confirmed](#) his client is the figure referred to as computer executive one in  
18 the indictment. Joffe has not been accused of any wrongdoing.

19 Jones testified he was asked by a Democratic investigator on the Senate Armed Services  
20 Committee to investigate the Alfa Bank allegations in early 2017 and to meet with Sussmann, who  
21 had represented both the Clinton campaign/DNC and Joffe.

22 Jones testified he received computer data from Sussmann containing 37 million DNS  
23 lookups to review for any connections of Trump-Russia collusion, and later learned the data came  
24 from a computer executive that Sussmann identified only by the pseudonym "Max." Jones said he  
25 quickly determined that executive to be Joffe.

26 "I understood the 37 million DNS lookups related to the Alfa Bank, Trump server  
27 allegations, to come either from Rodney Joffe or an organization associated with Mr Joffe," he  
28 testified.

1 [Just the News](#) first revealed earlier this month that Jones had been tasked by the Senate  
2 Armed Services Committee in 2017 to prepare a 600-plus-page report on the Alfa Bank-Trump  
3 allegations.

4 In his testimony, Jones revealed the Democratic staffer who tasked him with the work  
5 indicated Democrats in Congress did not believe the FBI and others in U.S. intelligence had  
6 aggressively enough investigated the Alfa Bank allegations before dismissing them.

7 "That was my perception, that the Senate Armed Services committee, other senators on the  
8 Senate Intelligence Committee and the House Intelligence Committee believed that the government  
9 wasn't doing enough to look into these allegations and refute them or confirm them or make any  
10 assessment of them," Jones testified.

11 Reacting to the [Just the News report](#) earlier this month, a whistleblower group known as  
12 Empower Oversight filed a complaint with the Senate Ethics Committee asking that it investigate  
13 whether senators violated the chamber's gift ban by tasking and accepting a detailed report from  
14 Jones' group without paying for it.

15 Jones said he built a firewall between Simpson's and Steele's research work for TDIP and  
16 the Senate Armed Services project because of their past ties to the Clinton campaign.

17 But he conceded under questioning that a 200-page appendix in the Senate report about Alfa  
18 Bank was derived mostly from research Simpson's firm collected.

19 Jones' testimony was given in a John Doe lawsuit filed by Alfa Bank seeking to determine  
20 who spread the allegations about the Russian bank to the news media and U.S. authorities.

21 While most federal agencies have strongly dismissed the Alfa Bank server theory, Jones said  
22 he still believes the information he provided the Senate in his final report in October 2018 is true  
23 and accurate.

24 Defendants, since before 2001, have regularly approached Victim/Witnesses  
25 and each of their companies in the internet, green building, aerospace, telecomm, internet video,  
26 fuels, energy and other industries through various agents and intermediaries with offers of  
27 pretension to "invest in" or "partner with" Victim/Witnesses. In each and every case, Defendants  
28 were on a fishing expedition to acquire Victim/Witnesses technologies, copy those technologies and  
monetize those technologies under Defendants own brands. When Victim/Witnesses continued to

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1 compete with Defendants copy-cat technologies, Defendants operated hit-jobs against  
2 Victim/Witnesses using DNC-controlled publications like Gawker, Gizmodo, Defendants, Twitter,  
3 Facebook, TechDirt and other brand assassination web media manipulation services.

4 On or about May 3, 2005, the Victim/Witnesses received, in recognition by  
5 the Congress of the United States in its Iraq War Bill, a commendation and federal grant issued  
6 jointly by the Congress of the United States and the United States Department of Energy in the  
7 amount of approximately \$2M including additional resources and access to federal resources, as and  
8 for the development of domestic energy technology designed to offset the anticipated failure of  
9 Western access to the Middle East. That energy storage technology was to be used in connection  
10 with the research and development of an electric car to be used by the Department of Defense and  
11 the American retail automotive market to create domestic jobs, enhance national security and  
12 provide a domestic energy solution derived entirely from domestic fuel sources. Victim/Witnesses  
13 had been invited into the program by U.S. Senate and Agency officials with the request that  
14 Victim/Witnesses “help their country in a time of need..”.

15 11. Beginning in or about July of 2006, the Victim/Witnesses were contacted by,  
16 various individuals representing venture capital officers and investors employed by, and/or with, the  
17 Defendants. These individuals were agents of the Defendant, Defendants, “RechargeIT” Project  
18 and Defendants partner, Tesla Motors. They also represented the Kleiner Perkins Group,<sup>1</sup>  
19 McKinsey Consulting, Deloitte Consulting, Khosla Ventures, In-Q-Tel and associated parties  
20 funded by and reporting to the Defendants, Alphabet and Defendants, and included Karim Faris, a  
21  
22  
23  
24  
25

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26 <sup>1</sup> Now under federal investigation, a subject of the 60 Minutes “**Cleantech Crash**” segment, and another 60  
27 Minutes segment about how Senators are bribed with Silicon Valley stock warrants and contract payola, the  
28 founding investor of Defendants, the other core recipient of the Steven Chu GOVT cash and a party  
mentioned by name in the federal anti-corruption lawsuits;

Defendants “partner.”<sup>2</sup>.

12. These investors feigned interest in emerging technology designed and developed by the Victim/Witnesses and requested further information from Victim/Witnesses. These investors informed the Victim/Witnesses that their interest was in purchasing the emerging technology from the Victim/Witnesses, investing in the venture, or structuring a form of joint venture with him.

13 This was not the truth.

14. The truth was that the Victim/Witnesses were contacted in efforts on behalf of the Defendants, so as to harvest confidential data and gather business intelligence and trade secrets for the purpose of copying the intellectual property and ideas of the Victim/Witnesses and interdicting Victim/Witnesses efforts, which Defendants found to be competitive, in a superior manner, to Defendants business. The Defendants agents and investors were simply on fishing expeditions while operating under the guise of proffered investment potential when, indeed, the Defendants had a covert plan to “*Cheat rather than compete*”. Historical facts and public testimony have proven that Defendants had poor skills at innovation and invention and that Defendants regularly chose to steal technologies, from multiple parties, on an ongoing basis, rather than invent their own technologies. A simple search, by any one, on the other top non-Defendants search engines for the phrase: “*Defendants steals ideas*” brings up a remarkable set of documentation of an ongoing pattern of theft by Defendants. Victim/Witnesses have cooperated with federal

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<sup>2</sup> Per Defendantsdescription of Him: “Karim brings more than a decade of entrepreneurial and investment experience to their role. He joined Defendants s corporate development and politics team in 2008, the group responsible for the company s investments and acquisitions, and joined Defendants Ventures in 2010. Prior to Defendants, Karim was a venture capitalist at Atlas Venture, where he worked on over a dozen investments in Internet infrastructure, digital media, and consumer services. Previously, he was Director of New Ventures at Level 3 Communications, responsible for evaluating new business opportunities and has led product development for the company s voice services. Earlier in his career, Karim held various product and marketing roles at Intel, initially on the i486, and later as product manager for the Pentium Processor. He started his career at Siemens as a software engineer working on the first vehicle navigation system for BMW. Karim holds an MBA from the Harvard Business School, an MS in Electrical Engineering from the University of Michigan, and a BS in Computer”

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1 investigators and journalists who are also investigating Defendants and who have legally shared  
2 some of the research, contained herein, with Victim/Witnesses.

3 15. In or about August 21 of 2009, just as the Victim/Witnesses were informed  
4 they were about to be awarded federal funding in amount over \$50 million, the Victim/Witnesses  
5 fuel cell and electric vehicle project was suddenly defunded and the same funds re-allocated to the  
6 Defendants, and to their various related entities, shell companies and projects. In other words,  
7 federal investigators state that Defendants bribed public officials to take Victim/Witnesses money  
8 away from Victim/Witnesses and give it Defendants using illegal manipulations of State and  
9 Federal taxpayer funded Treasury accounts. Defendants then manipulated those funds in stock  
10 market pump-and-dump schemes, off-shore tax evasion and tax write-off schemes which U.S.  
11 Treasury investigators called “unjust rewards at the expense of the taxpayer and the law..”

12 16. In or about August of 2009, just as the Victim/Witnesses was informed they  
13 were about to be awarded the first \$60 million federal funding for their energy storage technology  
14 and vehicle factory, this project was similarly defunded and the same funds re-allocated to the  
15 Defendants, and to their various related entities, shell companies and projects.

16 17. These funds, were ear-marked to be used by Defendants in a scheme  
17 designed for mining and exploiting non-domestic energy resources, (which eventually created a  
18 threat to U.S. domestic security by destabilizing other nations) via investment bank stock market  
19 mining commodities manipulations Defendants had arranged with their investment bankers,  
20 including Goldman Sachs. Until 2016, Victim/Witnesses were not aware that Defendants had  
21 placed their friends, employees and business associates in charge of the public agencies responsible  
22 for distributing these taxpayer funds. Indeed, the facts on public record and in breaking  
23 investigations and investigative journalism reports now prove that Defendants bought public policy  
24 influence with cash and internet services, much of that influence buying now found to have not been  
25 legally reported. The Defendants had their agents in California State and U.S. Federal offices  
26 distribute those funds to themselves while cutting out and sabotaging most all competing  
27 Victim/Witnessess. The Defendants, own a managing interest and control the source of these  
28

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foreign mining resources and the supply chain for them.<sup>3 4</sup>

18. In or about September 20, 2009, the Victim/Witnesses, were contacted by the Government Accountability Office of the United States with a request that they participate in an investigation being conducted by that entity into the business practices of the Defendants, and their associates, pursuant to anti-trust allegations and allegations of corruption.

19. In or about January 15, 2010, the Victim/Witnesses, did, in fact, provide live testimony to, and receive information from, the Government Accountability Office of the United States, the Department of Justice, Robert Gibbs ( who immediately thereafter quit his job at The White House) and their staff at the White House Press Office, the Washington Post White House Correspondent and other investigators.<sup>5</sup>

20.. The testimony provided by the Victim/Witnesses, was, in fact, truthful and did, in fact, tend to support the veracity of the anti-trust allegations under investigation by the

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<sup>3</sup> This control has been established by the Defendants, Defendants and Alphabet, through a series of series of sophisticated and complex relationships with electric vehicle companies including VVC, Tesla Motors, Driverless Car Project and other of the Victim/Witnesses's competitors as well as the numerous main-stream investigative journalism articles attached as Exhibits which provide proof that Defendants paid public officials billions of dollars of unreported cash and search services in exchange for market monopolies which harmed Victim/Witnesses, among others.

<sup>4</sup> These are two of the numerous interceptions of public funding by the Defendants, Defendants and Alphabet, of funds originally allocated to the Victim/Witnesses. As with the other interceptions, the Victim/Witnesses subsequently suffered media and revenue attacks authored by and originating with the Defendants, Defendants and Alphabet, Inc. in a manner intended to ensure that the Victim/Witnesses enjoyed no public or governmental sympathy or remaining alternative for relief.

<sup>5</sup> The Victim/Witnesses has also provided multiple written and verbal reports to the FBI, via Mr. James Comey and his staff at the Washington office, and Mr. David Johnson of the San Francisco office. The FBI investigation of the related matters is described as "on-going."

Government Accountability Office and other federal and EU agencies.<sup>6</sup>

21. In or about June, 2010 and January, 2015 the Defendants, Alphabet and Defendants, exchanged funds with tabloid publications. As a result, those tabloid publications coincidentally published the only two articles and the only custom animated attack film including false, defamatory, misleading and manufactured information belittling the Victim/Witnesses, attacking them and discrediting their reputation as an inventor, project developer and project

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<sup>6</sup> The Defendants, are charged with engaging in corruption of the Advanced Technology Vehicles Manufacturing Loan (“ATVM”) and Section 1703 Loan Guarantee (“LG”) programs. In litigation: WITNESS v. U.S. Dep’t of Energy, Case. No. 13-cv-00037, and Case No. USCA 16-5279, the crimes enumerated in which were financed, benefacted and operated by Victim/Witnesses per FBI records; The Court has directed “a good faith and unbiased reconsideration of” its contemplated renewed funding applications. However, the Victim/Witnesses, COMPANY B, and most other Victim/Witnessess believe — and have filed a well-pleaded verified complaint — that their previous applications were subjected to a biased, politically tainted, and otherwise unfair and corrupt review compromised by Defendants. Renewal without proper oversight could be a fruitless exercise and could prejudice the Victim/Witnesses, COMPANY B’s, legal rights. Victim/Witnessess have now sought concrete assurances that the applications will be reviewed fairly without the corrupting influence of the Defendants, Defendants and Alphabet. Specifically, the Victim/Witnessess request the following: that any agency produce the administrative record in order to ensure transparency. The Victim/Witnesses, COMPANY B, and others have noted that the fees associated with LG and ATVM program applications are excessive and burdensome. See, e.g., Am. Ver. Compl. ¶ 75; GAO, 2014 Annual Report: Additional Opportunities to Reduce Fragmentation, Overlap, and Duplication and Achieve Other Financial Benefits, GAO-14-343SP (April 2014), page 7 (stating that “most Victim/Witnessess and manufacturers we had spoken to indicated that the costs of participating outweigh the benefits to their companies .....”); GAO, Department of Energy: New Loan Guarantee Program Should Complete Activities Necessary for Effective and Accountable Program Management, GAO-08-750 (July 2008) (reporting that the high application fees “may lead to biases in the projects that receive guarantees”). Nonetheless, GOVT has actually raised at least one LG program application fee to \$50,000 and this is assumed, by some, on orders from Defendants to discriminate against Victim/Witnessess who are not part of the Silicon Valley business Cartel controlled by Defendants. See GOVT, Title XVII Application Process, <http://energy.gov/node/988041/Fees> (last visiting Feb. 25, 2016). In the Victim/Witnesses, COMPANY B’s, first application, The U.S. Government waived the application fee as to the Victim/Witnesses, COMPANY B and other Victim/Witnessess. Am. Ver. Compl. ¶ 76. A precedent has been set and The U.S. Government should continue to honor its waiver of the Victim/Witnesses, COMPANY B’s, application fees in the renewed application and that the Department will consider COMPANY B’s ATVM renewed application as



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1 director.<sup>7</sup>

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3 22. In or about January 20, 2011, the Victim/Witnesses, contacted Defendants,  
4 with written requests that it delete the false, defamatory, misleading and manufactured information  
5 belittling the Victim/Witnesses, attacking them and discrediting their reputation as an inventor,  
6 project developer and project director from its search engine servers.

7  
8 having satisfied “eligibility screening.” 10 C.F.R. § 611.103(a). The Victim/Witnesses, COMPANY B,  
9 alleges that the reviewers and decision-makers on the Victim/Witnesses, COMPANY B’s, original  
10 applications were tainted by political bias and controlled by the Defendants, Alphabet and Defendants. Am.  
11 Ver. Compl. ¶¶ 115-118. During oral argument on December 11, 2015, however, counsel for the government  
12 stated that “most, if not all, the senior level decision-makers that would be making a decision regarding these  
13 programs have “since departed the agency.” Transcript of Oral Argument, December 11, 2015, page 32. The  
14 Victim/Witnesses, COMPANY B, has asked for The U.S. Government to identify (1) all of the decision-  
15 makers, “senior level” and otherwise, who will be involved in making any decisions regarding the  
16 Victim/Witnesses, COMPANY B’s, applications along with their position at the agency and the date they  
17 began working at the agency and identify which, if any, were in the same position upon the  
18 Victim/Witnesses, COMPANY B’s, first review, and (2) all firms, advisors, and individuals, if any, the  
19 agency has hired, or intend to hire, that will perform any review or analysis of the Victim/Witnesses,  
20 COMPANY B’s, applications. The Victim/Witnesses has demanded that the relationship of each of those  
21 persons, to the Defendants, Alphabet and Defendants, be identified. The U.S. Government has enacted  
22 regulations and published manuals concerning its policies and procedures for reviewing LG and ATVM  
23 applications. See, e.g., 10 CFR Part 609; 10 CFR Part 611; GOVT, Guidance For Victim/Witnessess To The  
24 Advanced Technology Vehicles Manufacturing Loan Program (publically available at:  
25 [http://www.energy.gov/sites/prod/files/2015/02/f19/ATVM\\_Guidance\\_for\\_Victim/Witnessess\\_11.4.14.pdf](http://www.energy.gov/sites/prod/files/2015/02/f19/ATVM_Guidance_for_Victim/Witnessess_11.4.14.pdf)).  
26 However, the agency failed to follow those processes, and allowed corruption by the Defendants to taint the  
27 programs in reviewing applications. See, e.g., Am. Ver. Compl. ¶¶ 111, 114, 118; GAO, GOVT Loan  
28 Guarantees: Further Actions Are Needed to Improve Tracking and Review of Applications, GAO-12-157  
(March 2012); GAO, Department of Energy: New Loan Guarantee Program Should Complete Activities  
Necessary for Effective and Accountable Program Management, GAO-08-750 (July 2008) (stating that  
GOVT “has not developed detailed policies and procedures, including roles and responsibilities and criteria  
that demonstrate how GOVT plans to evaluate the applications”). For example, the agency is required to  
consult with the Department of the Treasury. See, e.g., 2 U.S.C. § 16512(a) (“the Secretary shall make  
guarantees under this or any other Act for projects on such terms and conditions as the Secretary determines,  
after consultation with the Secretary of the Treasury, only in accordance with this section”); see also GOVT



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23. The Victim/Witnesses had numerous lawyers, specialists and others contacted Defendants requesting a cessation of Defendants harassment and internet manipulation and removal of the rigged attack links and hidden internet codes within the links on Defendants server architecture.

24. At all times pertinent, the Victim/Witnesses, including Defendants staff members, Matt Cutts, Forest Timothy Hayes, Defendants legal staff and others refused to assist and commonly replied: “...just sue us..”, “...get a subpoena...”, etc., even though the Victim/Witnesses,

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Final Rule, 10 C.F.R. § 609.7 (requiring consultation with Treasury). The agency, however, has in many instances consulted with Treasury after making its decision. GAO, GOVT Loan Guarantees: Further Actions Are Needed to Improve Tracking and Review of Applications, GAO-12-157 (March 2012), page 23 Table 5 (reporting that this step was sometimes skipped). In fact, these steps were skipped as to those who received loans in order to benefit Defendants and harm Victim/Witnesses in the initial application (cite). Comments by the agency’s counsel at this Court’s hearing add to the Victim/Witnesses, COMPANY B’s, concerns that the agency disregards its own procedural rules in order to benefit the Defendants, Alphabet and Defendants, and to harm the Victim/Witnesses for anti-trust, monopolistic and vindictive efforts by the Defendants, Alphabet and Defendants. See Transcript of Oral Argument, December 11, 2015, page 25 (“I’m not sure if there isn’t an ordinary process. ... [M]y understanding is that there isn’t a step one, you know, a set-down procedure that must be followed.”). The Victim/Witnesses, COMPANY B, has demanded that The U.S. Government clarify what procedures, review steps, and criteria the agency intends to follow in reviewing the Plaintiff, COMPANY B’s, renewed applications that will assure the Victim/Witnesses that no further corruption will taint the process. LG and ATVM program applications have been reviewed by individuals who lack sufficient engineering expertise to do so and are beholden to illegally skew decisions to the Defendants, Alphabet and Defendants. See, e.g., Am. Ver. Compl. ¶¶ 86 (ECF No. 26); and GAO, Advanced Technology Vehicle Loan Program Implementation In Under Way, but Enhanced Technical Oversight and Performance Measures Are Needed, GAO-11-145 (Feb. 2011). Here, the agency initially denied the Plaintiff, COMPANY B’s, ATVM application under the erroneous premise that its product was not designed to be used in an automotive vehicle when, in fact, the product was exclusively designed for automobiles and was recognized as such by the world’s media and the largest set of customer orders and customer letters of support for the product for their “AUTOMOBILES”. Am. Ver. Compl. Exs. 7 & 9. Victim/Witnesses company, other state and federal regulatory agencies, the voting public, and news investigators have demanded that the GOVT specify which of the individuals who will evaluate the Victim/Witnesses, COMPANY B’s, applications are trained as engineers, the nature of their qualifications and their relationship to Defendants or any other competing entity. As of the date of this filing, thousands of news reports and televised news programs have accused Defendants of economic and corruption crimes relative to Government funding programs.

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1 and the Victim/Witnesses representatives, provided the Defendants with extensive volumes of third-  
2 party proof clearly demonstrating that not a single statement in the attack links promoted by google  
3 was accurate or even remotely true.

4 25. In, or about, February 20, 2011, YouTube, published a custom produced and  
5 targeted attack video that also included false, defamatory, misleading and manufactured information  
6 belittling the Victim/Witnesses, and discrediting their reputation as an inventor, project developer  
7 and project director. The video is believed to have been produced by Defendants as part of their  
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27 <sup>7</sup> Defendants is known to have provided tens of millions of dollars to this tabloid chain per Defendants financial staff, SEC filings  
28 and disclosures in other legal cases.

1 anti-trust attack program against Victim/Witnesses.

2  
3 26. In or about February 25, 2011 the Victim/Witnesses contacted the  
4 Defendants, YouTube and Defendants, with many written requests that they delete the false,  
5 defamatory, misleading and manufactured information belittling the Victim/Witnesses, attacking  
6 them and discrediting their reputation as an inventor, project developer and project director from its  
7 website. [See, Sample responses of the Defendants Defendants and YouTube, attached as Exhibits  
8 and incorporated herein by reference.]

9 27. All of the written demands of the Victim/Witnesses were to no avail and none  
10 of the Defendants, agreed to edit, delete, retract or modify any of the false, defamatory, misleading  
11 and manufactured information belittling the Victim/Witnesses, attacking them and discrediting their  
12 reputation as an inventor, product developer and project director from their websites and digital  
13 internet and media platforms and architecture.

14 28. The Victim/Witnesses, whose multiple businesses ventures had already  
15 suffered significant damage as the result of the online attacks of the Defendants, contacted  
16 renowned experts, and especially Search Engine Optimization and forensic internet technology (IT)  
17 experts, to clear and clean the internet of the false, defamatory, misleading and manufactured  
18 information belittling the Victim/Witnesses, attacking them and discrediting their reputation as an  
19 inventor, product developer and project director from their websites.

20 29. None of the technology experts hired by the Victim/Witnesses, at substantial  
21 expense, were successful in their attempts to clear, manage or even modify the false, defamatory,  
22 misleading and manufactured information belittling the Victim/Witnesses, attacking him and  
23 discrediting their reputation as an inventor, product developer and project director which only  
24 Defendants, the controlling entity of the internet, refused to remove. In fact, those experts were able  
25 to even more deeply confirm, via technical forensic internet analysis and criminology technology  
26 examination techniques that Defendants was rigging internet search results for its own purposes and  
27 anti-trust goals.

28 30. All efforts, including efforts to suppress or de-rank the results of a name  
search for "Victim/Witnesses" failed, and even though tests on other brands and names, for other

1 unrelated parties did achieve balance, the SEO and IT tests clearly proved that Defendants was  
2 consciously, manually, maliciously and intentionally rigging its search engine and adjacent results  
3 in order to “mood manipulate” an attack on Victim/Witnesses.

4 31. In fact, the experts and all of them, instead, informed the Victim/Witnesses,  
5 that, not only had Defendants locked the false, defamatory, misleading and manufactured  
6 information belittling the Victim/Witnesses, attacking them and discrediting their reputation as an  
7 inventor, project developer and project director into its search engine so that the information could  
8 never be cleared, managed or even modified, Defendants had assigned the false, defamatory,  
9 misleading and manufactured information belittling the Victim/Witnesses, attacking them and  
10 discrediting their reputation as an inventor, project developer and project director “PR8”  
11 algorithmic internet search engine coding embedded in the internet information-set programmed  
12 into Defendantsinternet architecture. [See, Information received from one of over 30 IT, forensic  
13 network investigators and forensic SEO test analysts, a true and correct copy of which is attached  
14 hereto in the Exhibits.] Victim/Witnesses even went to the effort of placing nearly a thousand  
15 forensic test servers around the globe in order to monitor and metricize the manipulations of search  
16 results of examples of the Victim/Witnesses name in comparison to the manipulations for PR hype  
17 for Defendants financial partners, for example: the occurrence of the phrase “Elon Musk”,  
18 Defendants business partner and beneficiary, over a five year period. The EU, China, Russia, and  
19 numerous research groups (ie: [http://www.politico.com/magazine/story/2015/08/how-google-could-](http://www.politico.com/magazine/story/2015/08/how-google-could-rig-the-2016-election-121548)  
20 [rig-the-2016-election-121548](http://www.politico.com/magazine/story/2015/08/how-google-could-rig-the-2016-election-121548) By Robert Epstein ) have validated these forensic studies of  
21 Defendants architect-ed character assassination and partner hype system .

22 32. The “PR8” codes are hidden codes within the Defendants software and  
23 internet architecture which profess to state that a link is a “fact” or is an authoritative factual  
24 document in Defendantsopinion. By placing “PR8” codes in the defamatory links that Defendants  
25 was manipulating about Victim/Witnesses, Defendants was seeking to tell the world that the links  
26 pointed to “Facts” and not “Opinions”. Defendants embedded many covert codes in their  
27 architecture which marketing the material in the attack links and video as “facts” according to  
28 Defendants.

33. The “PR8” codes are a set of codes assigned and programmed into the  
internet, by the Defendants to matters it designates as dependable and true, thereby attributing

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1 primary status as the most significant and important link to be viewed by online researchers  
2 regarding the subject of their search.<sup>8</sup> Defendants was fully aware that all of the information in the  
3 attack articles against Victim/Witnesses was false, Defendants promoted these attacks as vindictive  
4 vendetta-like retribution against Victim/Witnesses.

5 34. At all times pertinent from January 1, 2006, to in or about November 20,  
6 2015, Defendants maintained it had no subjective control or input into the rankings of links  
7 obtained by online researchers as the result of a search on its search engines and that its search  
8 engine algorithms and the functions of its media assets were entirely “arbitrary” according to the  
9 owners and founders of Defendants.

10 35. In or about April 15, 2015, The European Union Commission took direct  
11 aim at Defendants Inc., charging the Internet-search giant with skewing and rigging search engine  
12 results in order to damage those who competed with Defendants business and ideological interests.

13 36. In those proceedings, although Defendants continued to maintain that it has  
14 no subjective control or input into the rankings of links obtained by online researchers as the result  
15 of a search on its search engines and that its staff had no ability to reset, target, mood manipulate,  
16 arrange adjacent text or links, up-rank, down-rank or otherwise engage in human input which would  
17 change algorithm, search results, perceptions or subliminal perspectives of consumers, voters, or  
18 any other class of users of the world wide web, also known as The Internet, the court, in accord with  
19 evidence submitted, determined that Defendants, does in fact have and does in fact exercise,

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24 <sup>8</sup> Defendants has a variety of such hidden codes and has various internal names for such codes besides, and  
25 in addition to, “PR8”. Defendants has been proven to use these fact vs. fiction rankings to affect elections,  
26 competitors rankings, ie: removing the company: NEXTAG from competing with Defendants on-line; or  
27 removing political candidates from superior internet exposure and it is believed by investigators and  
28 journalists, that Defendants are being protected from criminal prosecution by public officials who  
Defendants have compensated with un-reported campaign funding.

subjective control over the results of information revealed by searches on its search engine.<sup>9</sup>

37. As a result of receiving this information, the Victim/Witnesses became convinced of the strength and veracity of their original opinion that the Defendants, had, in fact posted the false, defamatory, misleading and manufactured information belittling the Victim/Witnesses, attacking them and discrediting Victim/Witnesses reputation as inventor, project developer and project designer had been intentionally designed, published, orchestrated and posted by them in retaliation to the true testimony provided by the Victim/Witnesses, to the Government Office of Accountability of the United States in May of 2005, and to the Securities and Exchange Commission, The Federal Bureau of Investigation, The United States Senate Ethics Committee and other investigating parties, and had been disseminated maliciously and intentionally by them in an effort to do damage to their reputation and to their business prospects and to cause him severe and irremediable emotional distress.

38. In fact, the Victim/Witnesses, has suffered significant and irremediable damage to their reputation and to their financial and business interests. As a natural result of this damage, as intended by the Defendants, Gawker, Defendants and Youtube, the Victim/Witnesses has also suffered severe and irremediable emotional distress.

<sup>10</sup> 39. To this day, despite the age of the false, defamatory, misleading and manufactured information belittling the Victim/Witnesses, attacking him and discrediting their

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<sup>9</sup> The EU case, and subsequent other cases, have demonstrated that Defendants sells such manipulations to large clients in order to target their enemies or competitors or raise those clients subliminal public impressions against competitors or competing political candidates. In fact, scientific study has shown that although Defendants claims to “update its search engine results and rankings, sometimes many times a day”, the attack links and codes against Victim/Witnesses have not moved from the top lines of the front page of Defendants for over FIVE YEARS. If Defendants were telling the truth, the links would have, at least, moved around a bit or disappeared entirely since hundreds of positive news about Victim/Witnesses was on every other search engine EXCEPT Defendants. Many other lawsuits have now shown that Defendants locks attacks against its enemies and competitors in devastating locations on the Internet. The entire nations of China, Russia, Spain and many more, along with the European Union have confirmed the existence and operation of Defendants “attack machine”.

<sup>10</sup> As a party, attacked in a similar “hit job” media attack describes it: “Gawker sets up the ball and Defendants kicks it down the field....over and over, until the end of time”. The recent Hulk Hogan, and other lawsuits, against Gawker Media has clearly demonstrated that Defendants and Gawker run “hit jobs” against adversaries of themselves and their clients.

1 reputation as an inventor, project developer and project director, in the event any online researcher  
2 searches for information regarding the Victim/Witnesses, the same information appears at the top of  
3 any list of resulting links.

4 40. In addition, due to their control of all major internet database interfaces, Defendants have  
5 helped to load negative information about Victim/Witnesses on every major HR and employment  
6 database that Victim/Witnesses might be searched on, thus denying Victim/Witnesses all reasonable  
7 rights to income around the globe by linking every internal job, hiring, recruiter, employment,  
8 consulting, contracting or other revenue engagement opportunity for Victim/Witnesses back to false  
9 “red flag” or negative false background data which is designed to prevent Victim/Witnesses from  
10 future income in retribution for Victim/Witnesses assistance to federal investigators.<sup>11</sup>

11 41. It should be noted here that, in 2016, one of the companies Victim/Witnesses was associated  
12 with, in cooperation with federal investigations, won a federal anti-corruption lawsuit against the  
13 U.S. Department of Energy in which a number of major public officials were forced to resign under  
14 corruption charges, federal laws and new legal precedents benefiting the public were created, and  
15 Defendants and its associates and related entities found culpable of corruption.

16 With specific attention to Victim/Witnesses claims being “personal injury tort...claims” under 28  
17 U.S.C. § 157(b)(2)(B) and the inapplicability of the California Anti-SLAPP law, Cal. Code. of Civ.  
18 P. § 425.16, to Defendants potential claim objections, and state as follows:

#### 19 20 Procedural Background

21  
22 <sup>11</sup> Major public figures and organizations, including the entire European Union, have also accused Defendants of similar internet  
23 manipulation by Defendants. The attacks, by Defendants, continue to this day. In 2016, the renowned Netflix series: “House of  
24 Cards” opened its sixth season with a carefully held script-surprise researched by the script factuality investigators for the production  
25 company of “House of Cards.” The surprise featured Defendants, fictionally named “PollyHop,” and described, in detail, each of the  
26 tactics that Defendants uses to attack individuals that Defendants owners have competitive issues with. The Victim/Witnesses  
27 maintains that each and every tactic included in the televised example were tactics actually used to attack the Victim/Witnesses, his  
28 intellectual properties, his peers and his associates as threatening competitors.

1 Victim/Witnesses are residents of the State of California and the Companies are organized and  
2 domiciled in that jurisdiction. INDIVIDUAL A is the senior shareholder of the Companies

3 From January of 2011 until today , Defendants maliciously libeled Victim/Witnesses through its  
4 employees Adrian Covert, and John Herman, A.J. Delaurio, as well as through its pseudonymous  
5 authors, including: Adam Dachis, Adam Weinstein, Adrian Covert, Adrien Chen, Alan Henry,  
6 Albert Burneko, Alex Balk, Alexander Pareene, Alexandra Philippides, Allison Wentz, Andrew  
7 Collins, Andrew Magary, Andrew Orin, Angelica Alzona, Anna Merlan, Ariana Cohen, Ashley  
8 Feinberg, Ava Gyurina, Barry Petchesky, Brendan I. Koerner, Brendan O'Connor, Brent Rose,  
9 Brian Hickey, Camila Cabrer, Choire Sicha, Chris Mohny, Clover Hope, Daniel Morgan, David  
10 Matthews, Diana Moskovitz, Eleanor Shechet, Elizabeth Spiers, Elizabeth Starkey, Emily Gould,  
11 Emily Herzig, Emma Carmichael, Erin Ryan, Ethan Sommer, Eyal Ebel, Gabrielle Bluestone,  
12 Gabrielle Darbyshire, Georgina K. Faircloth, Gregory Howard, Hamilton Nolan, Hannah Keyser,  
13 Hudson Hongo. Heather Deitrich, Hugo Schwyzer, Hunter Slaton, Ian Fette, Irin Carmon, James J.  
14 Cooke, James King, Jennifer Ouellette, Jesse Oxfeld, Jessica Cohen, Jesus Diaz, Jillian Schulz,  
15 Joanna Rothkopf, John Cook, John Herrman, Jordan Sargent, Joseph Keenan Trotter, Josh Stein,  
16 Julia Allison, Julianne E. Shepherd, Justin Hyde, Kate Dries, Katharine Trendacosta, Katherine  
17 Drummond, Kelly Stout, Kerrie Uthoff, Kevin Draper, Lacey Donohue, Lucy Haller, Luke Malone,  
18 Madeleine Davies, Madeline Davis, Mario Aguilar, Matt Hardigree, Matt Novak, Michael Ballaban,  
19 Michael Dobbs, Michael Spinelli, Neal Ungerleider, Nicholas Aster, Nicholas Denton, Omar  
20 Kardoudi, Pierre Omidyar, Owen Thomas, Patrick George, Patrick Laffoon, Patrick Redford, Rich  
21 Juzwiak, Richard Blakely, Richard Rushfield, Robert Finger, Robert Sorokanich, Rory Waltzer,  
22 Rosa Golijan, Ryan Brown, Ryan Goldberg, Sam Faulkner Bidle, Sam Woolley, Samar Kalaf,  
23 Sarah Ramey, Shannon Marie Donnelly, Shep McAllister, Sophie Kleeman, Stephen Totilo, Tamar  
24 Winberg, Taryn Schweitzer, Taylor McKnight, Thorin Klosowski, Tim Marchman, Timothy Burke,  
25 Tobey Grumet Segal, Tom Ley, Tom Scocca, Veronica de Souza, Wes Siler, William Haisley,  
26 William Turton and others writing under pseudonyms; through false accusations of vile and  
27 disgusting acts, including fraud and false invention.  
28

29 Defendants engaged in this campaign against Victim/Witnesses on the pages of its "Gizmodo",  
30 YouTube Channel, Twitter Accounts, "Deadspin", "Jalopnik" and other facades under Defendants  
31 "Gawker.com" and "Univision" websites. These libels also falsely accused Victim/Witnesses of  
32 lying in his published patents, journals and works-of-art. All of these false and defamatory



1 accusations were published on multiple webpages operated and controlled by Defendants and on  
2 social media platforms, such as Twitter and Google, through accounts operated and controlled by  
3 Defendants and/or its employees and agents.

4 These libels, which were also false light invasions of privacy, caused Victim/Witnesses  
5 considerable reputational, emotional, and financial harm, and they so identified him with  
6 Victim/Witnesses that it, too, was a victim of Defendants's tortious conduct and suffered  
7 reputational and financial harm as well.

8 Despite being given months to take responsibility for its misdeeds, Defendants failed to retract its  
9 libel, apologize, or take any other remedial steps. As set forth the California action, Defendants's  
10 modus operandi was to make extreme and outrageous statements, without regard for the truth, and  
11 without reasonable inquiry, in order to attract readers and generate revenue. As this Court is well  
12 aware, that business model ultimately imploded, resulting in multiple lawsuits and a substantial  
13 judgment against it.

14 Among those who decided that Defendants should not be permitted to get away with defamation for  
15 profit, Claimants reluctantly took the step to seek justice, risking that Defendants and its  
16 functionaries would employ the "Streisand effect" to republish the false accusations previously  
17 made in reporting on the suit itself.

18  
19 California Pro Per litigation asserting claims for defamation and false light invasion of privacy  
20 arising from the aforesaid false and defamatory statements.

21 Under California law, corporations that appear in propria persona may proceed with their right to sue  
22 upon the appearance of counsel for the corporation, which is without prejudice to a defendant. See  
23 CLD Constr., Inc. v. City of San Ramon, 120 Cal. App. 4th 1141, 1152 (1 st Dist. Ct. App. 2004).

24  
25 See Cal. Code of Civ. P. § 583.210(a). Claimants, without the assistance of counsel, diligently  
26 appeared or attempted to appear at all hearings as required.

1 Defendant is a media company not unlike CNN. Those who accuse CNN and other mainstream  
2 media outlets of “fake news” will probably revel in a recent decision by a federal judge in Atlanta,  
3 Georgia. While Judge Orinda Evans didn’t all out declare that CNN was peddling in falsehoods, she  
4 did take aim at the network in an initial judgment in favor of a former hospital CEO who sued CNN  
5 accusing them of purposely skewing statistics to reflect poorly on a West Palm Beach hospital.  
6 Judge Evans didn’t mince words in her 18-page order allowing the case to move forward, and  
7 dismissing CNN’s attempt to get it thrown out of court.

8 Davide Carbone, former CEO of St. Mary’s Medical Center in West Palm Beach, filed a defamation  
9 lawsuit against CNN after they aired what he claims were a “series of false and defamatory news  
10 reports” regarding the infant mortality rate at the hospital. CNN’s report said the mortality rate was  
11 three times the national average. However, Mr. Carbone contends that CNN “intentionally”  
12 manipulated statistics to bolster their report. He also claims that CNN purposely ignored  
13 information that would look favorable to the hospital in order to sensationalize the story.

14 “In our case, we contended that CNN essentially made up its own standard in order to conduct an  
15 ‘apples to oranges’ comparison to support its false assertion that St. Mary’s mortality rate was 3  
16 times higher than the national average. Accordingly, the case against CNN certainly fits the  
17 description of media-created ‘Fake News.’” said Carbone’s attorney L. Lin Wood, in a statement to  
18 LawNewz.com.

19  
20 Wood says that as a result of CNN’s story Carbone lost his job and it became extremely difficult for  
21 him to find new employment in the field of hospital administration.

22 “False and defamatory accusations against real people have serious consequences. Neither St.  
23 Mary’s or Mr. Carbone did anything to deserve being the objects of the heinous accusation that they  
24 harmed or put babies and young children at risk for profit,” Wood said.

25  
26 On Wednesday, Federal District Judge Orinda Evans ruled that the case could move forward, even  
27 ruling that she found that CNN may have acted with “actual malice” with the report — a standard  
28 necessary to prove a defamation claim.

1 “The Court finds these allegations sufficient to establish that CNN was acting recklessly with regard  
2 to the accuracy of its report, i.e., with ‘actual malice,’ the order reads. CNN had tried to get the case  
3 dismissed.

4 Nothing in the legislative history indicates that defamation or invasion of privacy claims are not  
5 “personal injury torts”. In fact, all of the history provided by Defendants would preclude their  
6 narrow interpretation when Congress was expressly acting to ensure the district court would hear  
7 such claims. Similarly, although some courts have permitted the California Anti-SLAPP law to be  
8 heard in cases involving diversity jurisdiction, it does not follow that the procedural mechanisms  
9 can apply in an objection to claim proceeding.

10 Defendants also neglects to mention its ongoing, post-petition libel. See, e.g., Trotter, J.K., “What  
11 did Internet Troll Chuck Johnson Know about Peter Thiel’s Secret War on Gawker?” (Jun. 17,  
12 2016) (reiterating false accusation of misreporting a story about Sen. Menendez) available at  
13 <[http://gawker.com/what-did-internet-troll-chuck-johnson-](http://gawker.com/what-did-internet-troll-chuck-johnson-know-about-peter-1782110939) know-about-peter-1782110939>.

14 At that hearing and in response to objections to claims, other claimants also argued that the district  
15 court was required to hear defamation claims as personal injury claims under 28 U.S.C. § 157(b)(2)  
16 (B).

### 17 18 **Personal Injuries are More Than Just Bodily Injuries**

19  
20 Although Defendants mentions the reorganization of authority between the bankruptcy courts and  
21 the district courts in the wake of Northern Pipeline Construction Co. v. Marathon Pipeline Co., 458  
22 U.S. 50 (1982), it fails to explain what motivated the Marathon decision.

23  
24 The concern in that case was the extent to which Congress could empower Article I courts. The  
25 Supreme Court specifically observed that “Congress cannot ‘withdraw from [Art. III] judicial  
26 cognizance any matter which, from its nature, is the subject of a suit at the common law, or in  
27 equity, or admiralty.’” 458 U.S. at 69 n.23, quoting Murray’s Lessee v. Hoboken Land &  
28 Improvement Co., 18 How. 272, 284 (1856). Such suits involved “private rights”, as opposed to  
“public rights” created legislatively.

1 During debate over the Bankruptcy Amendments and Federal Judgeship Act of 1983, Pub. L. 98-  
2 353, Senator Robert Dole specifically noted: This title establishes an article I bankruptcy court, with  
3 judges appointed for limited terms, to handle the routine business of bankruptcy claims based upon  
4 State law, which under Marathon will require the attention of article III judges, will be referred to  
5 the district courts except where the parties consent to bankruptcy court jurisdiction. One of those  
6 areas reserved for attention of the district courts will be personal injury claims, which are exempted  
7 from the definition of core proceeding under the bill. 130 Cong. Rec. S20083 (daily ed. June 29,  
8 1984). However, none of the legislative history, including that cited by Defendants, specifically  
9 addresses whether defamation claims are “personal injury” claims. 5i.

### 10 **Slander and Libel are Common-Law Personal Injury Claims**

11  
12 In determining the meaning of “personal injury”, this Court must look to the common law  
13 understanding. Over a century ago, in determining whether a slander was among the “willful and  
14 malicious injuries to the person or property of another” not discharged in bankruptcy, the Kentucky  
15 Court of Appeals found that a slander is a “personal injury—that is, an injury to his person”, and  
16 further explained its holding in the context that “[t]he act of Congress must be 5

17  
18 There is no inconsistency with including defamation claims among the “narrow range of cases” that  
19 are personal injury cases raised by Rep. Kastenmeir. 130 Cong. Rec. H7491. As Defendants notes,  
20 the sole example was an automobile accident claim; by Defendants’s logic, all medical malpractice  
21 claims would be excluded. None of the remainder of the legislative history cited provides any  
22 further insight.

23 Sutherland on Statutory Construction, 289.” Sanderson v. Hunt, 116 Ky. 435, 438, 76 S.W. 179,  
24 179 (1903); accord McDonald v. Brown, 23 R.I. 546, 51 A. 213 (1902); Nat’l Sur. Co. v. Medlock,  
25 2 Ga. App. 665, 58 S.E. 1131 (1907). The Sanderson decision was adopted by the Sixth Circuit  
26 Court of Appeals, similarly finding a libel to be a “personal injury” under the common law such that  
27 it would not be dischargeable under the bankruptcy act. Thompson v. Judy, 169 F. 553 (6th Cir.  
28 1909); 6 see also Parker v. Brattan, 120 Md. 428, 434-35, 87 A. 756, 758 (1913). This  
understanding was also adopted by at least one district court in the Second Circuit. See In re

1 Bernard, 278 F.734, 735 (E.D.N.Y. 1921). 14.

2 Congress, in drafting Section 157(b)(2)(B) must, therefore, be understood as having used the words  
3 “personal injury” with reference to its common-law acceptance. From the earliest cases, claims  
4 sounding in defamation have been deemed a “personal injury.” Indeed, this Court recognized as  
5 much nearly twenty years ago when it wrote in *In re Boyer*, 93 B.R. 313, 317 (Bankr. N.D.N.Y.  
6 1988), in the context of a Section 1983 & 1985 claim: The term “personal injury tort” embraces a  
7 broad category of private or civil wrongs or injuries for which a court provides a remedy in the form  
8 of an action for damages, and includes damage to an individual’s person and any invasion of  
9 personal rights, such as libel, slander and mental suffering, BLACK’S LAW DICTIONARY 707,  
10 1335 (5th ed. 1979).

11 Accord *Soukup v. Employers’ Liab. Assur. Corp.*, 341 Mo. 614, 625, 108 S.W.2d 86, 90 (1937)  
12 citing 3 Words & Phrases, Fourth Series, p. 90 (workers’ compensation case observing that “The  
13 words ‘personal injuries’ as defined by lexicographers, jurists and textwriters and by common  
14 acceptance, denote an injury either to the physical body of a person or to the reputation of a person,  
15 or to both.”)

16 Simply put, “[t]here is no firm basis to support the proposition that libel and slander were  
17 considered to be other than personal injuries at common law.” *McNeill v. Tarumianz*, 138 F. Supp.  
18 713, 717 (D. Del. 1956). In support thereof, the Delaware district court quoted 1 Blackstone 6 The  
19 Thompson decision was generally met with approval by the Second Circuit Court of Appeals in *In*  
20 *re Conroy*, 237 F. 817 (2d Cir. 1916).

21 Commentaries 129, which classified rights of “personal security” to consist “in a person’s legal and  
22 uninterrupted enjoyment of his life, his limbs, his body, his health and his reputation.” *Id.* at 716  
23 (further noting that the courts consider “rights of personal security” as synonymous with “personal  
24 injury”). 716.

25  
26 The Supreme Court of Pennsylvania, in 1825, laid down the following common law history in the  
27 context of a claim involving a decedent: That a personal action dies with the person is an ancient  
28 and uncontested maxim. But the term “personal action,” requires explanation. In a large sense, all  
actions except those for the recovery of real property, may be called personal. This definition would

1 include contracts for the payment of money, which never were supposed to die with the person. The  
2 maxim must therefore be taken in a more restricted meaning. It extends to all wrongs attended with  
3 actual force, whether they affect person or property; and to all injuries to the person only, though  
4 without force. Thus stood originally the common law, in which an alteration was made by the stat.  
5 4. Ed. 3. c. 7, which gave an action to an executor for an injury done to the personal property of his  
6 testator in his life, which was extended to the executor of an executor by stat. 25, Ed. 3. And by the  
7 stat. 31, Ed. 3 c. 11, administrators have the same remedy as executors. These statutes received a  
8 liberal construction from the judges, but they do not extend to injuries to the person of the deceased,  
9 nor to his freehold. So that no action now lies, by an executor or administrator for an assault and  
10 battery of the deceased, or trespass vi et armis, on his land, or for slander; because it is merely a  
11 personal injury.

12 Lattimore v. Simmons, 13 Serg. & Rawle 183, 184-85 (Pa. 1825) (emphasis added). 17.

13 The Supreme Court of Wisconsin, in 1874, expounded upon this concept in a matter involving state  
14 bankruptcy law. It observed “A libel or a slander might deprive a man of life.

15 The Georgia Supreme Court in Johnson v. Bradstreet Co., 87 Ga. 79, 81-82, 13 S.E. 250, 251  
16 (1891) expounded upon this understanding: At common law, absolute personal rights were divided  
17 into personal security, personal liberty, and private property. The right of personal security was  
18 subdivided into protection to life, limb, body, health, and reputation. 3 Blackst. Com. 119. If the  
19 right to personal security includes reputation, then reputation is a part of the person, and an injury to  
20 the reputation is an injury to the person. Under the head of “security in person,” Cooley includes the  
21 right to life, immunity from attacks and injuries, and to reputation. Cooley on Torts (2d ed.), 23, 24.  
22 See, also, Pollock on the Law of Torts, \*7. Bouvier classes among absolute injuries to the person,  
23 batteries, injuries to health, slander, libel, and malicious prosecutions. 1 Bouv. L. Dic. (6<sup>th</sup> ed.) 636.  
24 “Person” is a broad term, and legally includes, not only the physical body and members, but also  
25 every bodily sense and personal attribute, among which is the reputation a man has acquired.  
26 Reputation is a sort of right to enjoy the good opinion of others, and is capable of growth and real  
27 existence, as an arm or a leg. If it is not to be classed as a personal right, where does it belong? No  
28 provision has been made for any middle class of injuries between those to person and those to  
property, and the great body of wrongs arrange themselves under the one head or the other. Whether  
viewed from the artificial arrangement of law writers, or the standpoint of common sense, an injury  
to reputation is an injury to person.

1 In an attack that destroys: employment, destroy his credit, ruin his business, and greatly impair his  
2 estate; yet an action therefor would be an action for a personal injury, the effect of the wrong on the  
3 estate of the injured party being merely incidental.” Noonan v. Orton, 34 Wis. 259, 263 (1874).

4 That same year, the Supreme Court of Virginia recognized that an “action of slander” did “involve a  
5 claim for personal damages” and, as such, did not pass to the assignee in bankruptcy. Dillard v.  
6 Collins, 66 Va. 343, 345-47 (1874). 18.

7  
8 Similarly, a claim by a wife for slander was deemed a “personal injury” claim such that, under the  
9 law at that time, her husband was required to join in the suit. See, e.g., Smalley v. Anderson, 18 Ky.  
10 56 (1825) (in a claim for “personal injury”, husband was required to join suit with wife in claim for  
11 slander accusing her of adultery); accord Gibson v. Gibson, 43 Wis. 23, 26- 27 (1877); Leonard v.  
12 Pope, 27 Mich. 145, 146 (1873) (a claim for slander is “a personal grievance or cause of action”).  
13 The U.S. Court of Appeals for the Fifth Circuit agreed that “libel is a personal injury” and that “[a]t  
14 common law, libel and slander were classified as injuries to the person, or personal injuries. 3  
15 Blackstone, 119; Cooley on Torts (2d Ed.) 23, 24; Bouvier, Law Dictionary, verbo ‘Injury.’”  
16 Times-Democrat Pub. Co. v. Mozee, 136 F. 761, 763 (5th Cir. 1905). Although  
17 the law now recognizes spousal independence, the nature of the action has not changed. 19.

18  
19 The principle that slander and libel are personal injuries is one that was generally recognized, and,  
20 as seen above, it tended to be addressed in cases involving decedents. Blackstone, in his  
21 Commentaries (vol. 3, p. 302), stated the rule: “In actions merely personal, arising ex delicto, for  
22 wrongs actually done or committed by the defendant, as trespass, battery, and slander, the rule is  
23 that actio personalis moritur cum persona; and it shall never be revived either by or against the  
24 executors or other representatives.” Thus, by statute, states such as Illinois, in overriding the  
25 common law to permit actions to survive, expressly carved out slander and libel as being personal  
26 injuries that would not survive. See Holton v. Daly, 106 Ill. 131, 139 (1882) quoting Ill. Rev. Stat.  
27 1874, p. 126 (“actions to recover damages for an injury to the person, except slander and libel, ...  
28 shall also survive.”).

29 In contrast, a claim for wrongful death was not recognized at common law precisely because  
30 personal injury actions did not survive under the action personalis moritur cum persona universal

1 maxim.

2 Statutes were, therefore, enacted to permit claims for wrongful death “compensatory of the damages  
3 sustained by the heirs or next of kin, who had, or are supposed to have had, a pecuniary interest in  
4 the life of the intestate.” Burns v. Grand R. & I. R. Co., 113 Ind. 169, 171, 15 N.E. 230, 231 (1888).  
5 Specifically, “[t]hese statutes, while they do not in terms revive the common law right of action for  
6 personal injury, nor make it survive the death of the injured person, create a new right in favor and  
7 for the benefit of the next of kin or heirs of the person whose death has been wrongfully caused.” Id.

8  
9 Defendants mistakenly believes that the addition of “wrongful death” implies that because only  
10 such a claim can arise from the death of a natural person’s body, the term “personal injury” must be  
11 construed similarly in context. Defendants misunderstands that a wrongful death claim is not a  
12 common law personal injury claim; thus it had to be specifically added. The addition of wrongful  
13 death claims does not, however, modify the common law understanding of “personal injury,” which  
14 included libel and slander.

15 The legislative history, therefore, shows that claims for wrongful death were added because they  
16 were not recognized at common law to be a “personal injury.” Libel and slander, on the other hand,  
17 were. The legislative record is otherwise silent as to the specific torts that made up a “personal  
18 injury” claim and therefore should be understood to include all such claims at common law,  
19 including slander and libel. Although Defendants worries that claims for emotional damages will  
20 “create an exception that swallows the rule” (Defendants’s Brief at 10), it creates a straw- man  
21 argument, improperly lumping in claims that are not common law “personal injury” claims that  
22 happen to provide for emotional distress damages. Those claims are different, statutory causes of  
23 action; the only statutory claim included in Section 157(b)(2)(B) is the wrongful death claim.

24 Thus, when Congress enacted Section 157(b)(2)(B), it necessarily imported the common law  
25 meaning of “personal injury” and, therefore, libel and slander claims. 8 ii. Victim/Witnesses is  
26 Entitled to Invoke Section 157(b)(2)(B) 23. Defendantss seek to treat Victim/Witnesses, as a  
27 corporate person, differently under Section 157(b)(2)(B) than Victim/Witnesses. There is no reason  
28 for this. As libel is a “personal injury” tort, there is no basis to suggest a corporate person should be  
treated any differently than a natural person. Simply because it cannot suffer a battery does not



1 mean it is foreclosed from all personal injury claims. As explained by the Georgia Supreme Court in  
2 Johnson v. Bradstreet Co., 87 Ga. 79, 81-82, 13 S.E. 250, 251 (1891), an “injury to reputation is an  
3 injury to person.” Although a corporation may be unable to suffer a physical, bodily injury, it can  
4 suffer an injury to reputation.

5 Defendants’s citations are inapposite. The U.S. Supreme Court has not said that a corporation  
6 cannot suffer a personal injury; rather, N.P.R. Co. v. Whalen, 149 U.S. 157, 162-163 (1893),  
7 address actions in nuisance, which can only either affect life, health, senses, or property, and not  
8 reputation. Defendants’s quote from Roemer v. Commissioner of Internal Revenue, 176 F.3d 693,  
9 699 n. 4 (9th Cir. 1983), was a matter of pure dicta; the Ninth Circuit had no occasion to pass upon  
10 whether a corporation could, in fact, suffer a personal injury. Subsequent cases, such as In re Lost  
11 Peninsula Marina Dev. Co., LLC, 2010 U.S. Dist. LEXIS 78532 (E.D. Mich. 2010), wrongly rely  
12 upon such dicta. In fact, the Ninth Circuit’s entire basis was DiGiorgio Fruit Corp. v. American  
13 Federation of Labor, which does not say a corporation cannot suffer a “personal injury”;it merely  
14 says that “a corporation has no reputation in the personal sense”, yet “it has a business reputation”.  
15 215 Cal.App.2d 560, 571, 30 Cal.Rptr. 350, 356 (1963). The Second Circuit has specifically  
16 refrained from finding a dichotomy between a business reputation and the reputation 8

17 Similarly, as invasions of personal rights, Claimants’ false light invasion of privacy claims are  
18 “personal injury” claims. See Mercado v. Fuchs (In re Fuchs), No. 05-36028-BJH-7, 2006 Bankr.  
19 LEXIS 4543, at \*6-7 (U.S. Bankr. N.D. Tex. Jan. 26, 2006) (finding invasion of privacy claim to be  
20 a “personal injury” under Section 157(b)(2)(B)); see also Bernstein v. Nat’l Broad. Co., 129 F.  
21 Supp. 817, 825 (D.D.C. 1955) (“The tort of invasion of privacy being a personal injury....”)

22 of a natural person. See Agar v. Commissioner, 290 F.2d 283, 294 (2d Cir. 1961). However, the  
23 Eleventh Circuit specifically answered in the affirmative the question “[i]s damage to one’s  
24 business reputation a personal injury?” Fabry v. Commissioner, 223 F.3d 1261, 1270 (11th Cir.  
25 2000).

26 In fact, the purpose of Section 157(b)(2)(B) was to properly address claims that should be heard by  
27 an Article III court. As noted above, such was prompted by the Marathon decision, a case where the  
28 sole litigants were corporate persons. Where a natural person would have a right to have a matter

1 heard by an Article III court but a corporate person does not, such denial of equal protection would  
2 be unlawfully violative of due process under the Fifth Amendment. See *Bolling v. Sharpe*, 347 U.S.  
3 497 (1954) (holding equal protection claims implicate due process).

4 Even if corporate persons could be treated differently from natural persons for claims arising from  
5 the same transaction, it would be improper to abide Defendants's suggestion to have the Bankruptcy  
6 Court determine the corporate claim first, in order to then argue a preclusive effect against the  
7 natural person. This attempted end-run around a specifically mandated statutory provision,  
8 grounded in Constitutional rights, should not be condoned. This is not what the Supreme Court was  
9 considering in *Katchen v. Landy*, 382 U.S. 313 (1966); in *Katchen*, the determination involved a  
10 single party who submitted to equity jurisdiction. Victim/Witnesses has not taken action to deprive  
11 himself of his rights. Where Congress has acted to provide for access to Article III courts, it would  
12 run afoul of the intent of the law to make that access ephemeral.

13 Although Defendants at least has the decency to acknowledge that is its purpose, it would set an  
14 unconscionable precedent. Many natural persons conduct business through or have some  
15 relationship with a corporate person such that harms giving rise to their individual personal injury  
16 claims would also harm the corporate person. As a result, Defendantsswho would seek to deprive  
17 such natural persons of their right to be heard by an Article III court could simply involuntarily join  
18 or otherwise implead the related corporate person, have that matter heard first, and then attempt to  
19 preclude the natural person's claim on that basis.

### 20 **The California Anti-SLAPP Law does Not Apply**

21 Defendants's motion is not about allowance of claims; it is about whether a state law procedural  
22 mechanism is to apply in a non-adversarial, contested matter. Although some federal courts permit  
23 the application of the California Anti-SLAPP law, Cal. Code Civ. P. § 425.16, in civil cases arising  
24 from diversity jurisdiction, it has never been found applicable to a contested claim proceeding in  
25 bankruptcy court. The differences between the Federal Rules of Civil Procedure and the Federal  
26 Rules of Bankruptcy Procedure demonstrate that it makes little sense to do take such an  
27 unprecedented step.  
28

1 The very nature and purpose of a proof of claim differs from a traditional complaint, rendering the  
2 California law impracticable. As this Court is aware: Correctly filed proof of claims “constitute  
3 prima facie evidence of the validity and amount of the claim . . . . To overcome this prima facie  
4 evidence, an objecting party must come forth with evidence which, if believed, would refute at least  
5 one of the allegations essential to the claim.” *Sherman v. Novak (In re Reilly)*, 245 B.R. 768, 773  
6 (2d Cir. B.A.P. 2000). By producing “evidence equal in force to the prima facie case,” an objector  
7 can negate a claim's presumptive legal validity, thereby shifting the burden back to the claimant to  
8 “prove by a preponderance of the evidence that under applicable law the claim should be allowed.”  
9 *Creamer v. Motors Liquidation Co. GUC Trust (In re Motors Liquidation Co.)*, No. 12 Civ. 6074  
10 (RJS), 2013 U.S. Dist. LEXIS 143957, 2013 WL 5549643, at \*3 (S.D.N.Y. Sept. 26, 2013) (internal  
11 quotation marks omitted). If the objector does not “introduce[] evidence as to the invalidity of the  
12 claim or the excessiveness of its amount, the claimant need offer no further proof of the merits of  
13 the claim.” 4 *Collier on Bankruptcy* ¶ 502.02 (Alan N. Resnick & Henry J. Sommer eds., 16<sup>th</sup> ed.  
14 2014). *In re Residential Capital, LLC*, 519 B.R. 890, 907 (Bankr. S.D.N.Y. 2014). 30. In contrast,  
15 under Cal. Code Civ. P. § 425.16(b)(1): A cause of action against a person arising from any act of  
16 that person in furtherance of the person’s right of petition or free speech under the United States  
17 Constitution or the California Constitution in connection with a public issue shall be subject to a  
18 special motion to strike, unless the court determines that the Plaintiffs have established that there is  
19 a probability that the Plaintiffs will prevail on the claim.

20 California courts have established a two-step process: first, the defendant must establish the action  
21 arose from protected speech or petitioning activity, then “then the burden shifts to the Plaintiffs to  
22 establish a probability that the Plaintiffs will prevail on the claim, i.e., make a prima facie showing  
23 of facts which would, if proved at trial, support a judgment in Plaintiffs favor.

24 In making its determination, the trial court is required to consider the pleadings and the supporting  
25 and opposing affidavits stating the facts upon which the liability or defense is based.” *Dowling v.*  
26 *Zimmerman*, 85 Cal. App. 4th 1400, 1417, 103 Cal. Rptr. 2d 174, 188 (2001) (internal citations and  
27 quotation marks omitted).

28 Further, [t]o establish a probability of prevailing, the Plaintiffs must demonstrate that the complaint  
is both legally sufficient and supported by a sufficient prima facie showing of facts to sustain a  
favorable judgment if the evidence submitted by the Plaintiffs are credited. For purposes of this

1 inquiry, the trial court considers the pleadings and evidentiary submissions of both the Plaintiffs and  
2 the defendant (§ 425.16, subd. (b)(2)); though the court does not weigh the credibility or  
3 comparative probative strength of competing evidence, it should grant the motion if, as a matter of  
4 law, the defendant's evidence supporting the motion defeats the Plaintiffs attempt to establish  
5 evidentiary support for the claim. In making this assessment it is the court's responsibility to accept  
6 as true the evidence favorable to the Plaintiffs. The Plaintiffs need only establish that his or her  
7 claim has minimal merit to avoid being stricken as a SLAPP.

8 Soukup v. Law Offices of Herbert Hafif, 39 Cal. 4th 260, 291, 46 Cal. Rptr. 3D 638, 662-63, 139  
9 P.3d 30, 50 (2006) (internal citations and quotation marks omitted).

10 This process makes little sense in a non-adversarial, claims objection proceeding. First, as noted,  
11 Claimants' proofs of claim already enjoy a presumption of prima facie validity under Fed. R. Bankr.  
12 P. 3001(f) and Claimants' submissions must be accepted as true. Thus, as a matter of law,  
13 Claimants will always prevail on a California anti-SLAPP motion, having the "minimal merit"  
14 which would support allowance of the claim. Second, once a party objects to a proof of claim and  
15 introduces evidence of invalidity, a claimant must prove his claim by a preponderance of the  
16 evidence, not merely a probability of prevailing. Defendants would require a bankruptcy court to  
17 make an unnecessary finding that a disallowed claim nevertheless had a probability of prevailing.  
18 The burden shifting framework does not work in a contested claim proceeding, even if it might  
19 work for an adversarial matter or in a case under the Rules of Civil Procedure.

20 Notably, even in diversity cases, the entirety of the California Anti-SLAPP law is not imported in  
21 its entirety. Unlike in California state courts, a denial of an Anti-SLAPP motion is not an appealable  
22 interlocutory order in Federal courts. See Hyan v. Hummer, 825 F.3d 1043 (9th Cir. 2016). Federal  
23 courts do not apply the timing requirements set forth in Section 425.16(f), which directly collides  
24 with the timeline allowed under Fed. R. Civ. P. 56. See Sarver v. Chartier, 813 F.3d 891 (9th Cir.  
25 2016). Federal courts do not stay discovery upon the filing of an Anti- SLAPP motion, as otherwise  
26 directed by Section 425.16(g). See Metabolife Int'l, Inc. v. Wornick, 264 F.3d 832, 845 (9th Cir.  
27 2001).

28 Even the very idea of the burden-shifting framework has been questioned by the Ninth Circuit. See  
Englert v. MacDonell, 551 F.3d 1099, 1102 (9th Cir. 2009) (reserving the issue with respect to a

parallel Oregon statute). The D.C. Circuit directly confronted this issue in *Abbas v. Foreign Policy Grp., LLC*, 783 F.3d 1328, 1335 (2015). In *Abbas*, the D.C. Circuit directly rejected the idea that an analogous burden-shifting framework created a substantive, quasi-immunity from suit, because the law collided with Rules 12 and 56 as to how a showing is to be made, rendering it inapplicable pursuant to *Shady Grove Orthopedic Associates, P.A. v. Allstate Insurance Co.*, 559 U.S. 393, 398-99, 130 S. Ct. 1431 (2010). See 783 F.3d at 1335.

Defendants attempts to distinguish *Abbas* by highlighting the non-mandatory nature of applying Rules 12(b)(6) and 56, suggesting that collision is avoided if those rules are not applied. Defendants's Brief at 15-16. First, it bears observing that Defendants, in its objections to the claims, did move to apply Rule 12(b)(6), rendering its own argument moot. Thus, where § 425.16 does conflict with Rule 7012, its application would directly collide with this Court's authority to "direct that one or more of the other rules in Part VII shall apply." Fed. R. Bankr. P. 9014(c). Second, although Defendants argues that the Court can "otherwise direct" Rule 7056 not apply per Rule 9014, it provides no reason why the normal rules should be avoided here; Claimants located but one case where a bankruptcy court made such direction to permit the parties to "flesh out the record", there on a motion to employ, not a claims objection. See *In re Rusty Jones, Inc.*, 109 B.R. 838, 845 (Bankr. N.D. Ill. 1989). Fleshing out a record would similarly be reason not to apply § 425.16 where Defendants has otherwise obtained a briefing schedule in order for it to take discovery. See Dkt. No. 703. Essentially, the only reason to "otherwise direct" Rule 7056 not apply is because it collides with § 425.16. Third, to not apply certain rules simply because Claimants are California citizens would deny such citizens equal protection in a manner to be so violative of due process that it is an offense to the Fifth Amendment. See *Shapiro v. Thompson*, 394 U.S. 618, 642, 89 S. Ct. 1322, 1335 (1969).

Moreover, it makes little sense to import the California procedure where Fed. R. Bankr. P. 3007 permits parties in interest other than the Defendants to object to a claim. It could well be impracticable where a Defendants does not believe protected speech was involved, but a third party does. It is not equitable for one class of objector (a Defendants) to potentially enjoy the benefits of the California procedure (attorneys' fees) and not others (other creditors).

Contrary to the assertion of Defendants, the procedures of § 425.16 are not "bound up" with the law of libel, even to the extent Justice Stevens's concurrence in *Shady Grove Orthopedic Assocs., P.A.*

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1 v. Allstate Ins. Co., 599 U.S. 393, 419-410 (2010), is controlling. First, Defendants fails to identify  
2 what the substantive law is that Section 425.16 is bound up with. The California Anti-SLAPP law is  
3 not limited to the law of libel; it also applies to other state law claims. See, e.g., State Farm Mut.  
4 Auto. Ins. Co. v. Lee, 193 Cal. App. 4th 34, 122 Cal. Rptr. 3D 183 (2011) (application to abuse of  
5 process and unfair business practice claims); Jarrow Formulas, Inc. v. LaMarche, 31 Cal. 4th 728, 3  
6 Cal. Rptr. 3d 636, 74 P.3d 737 (2003) (application to malicious prosecution claims); Fremont  
7 Reorganizing Corp. v. Faigin, 198 Cal. App. 4th 1153, 131 Cal. Rptr. 3d 478 (2011) (application to  
8 breach of confidence, breach of fiduciary duty, equitable indemnity, and violation of Cal. R. Prof.  
9 Conduct 3-310(C)); Peregrine Funding, Inc. v. Sheppard Mullin Richter & Hampton LLP, 133  
10 Cal.App.4th 658, 674–675, 35 Cal. Rptr. 3D 31 (2005) (application to legal malpractice and breach  
11 of fiduciary duty claims). Section 425.16 is not analogous to a bond posting requirement, statute of  
12 limitations, evidentiary rule, or verdict capping identified by Justice Stevens, all of which have a  
13 substantive quality. See Shady Grove, 599 U.S. at 419-410. Here, Defendants seeks to employ a  
14 burden shifting framework that could appear at but one discrete stage of a diversity case and has no  
15 role in a claim objection; this is not even, then, an example of a “state-imposed burden[ ] of proof”,  
16 which would go to the ultimate outcome. Id. at 410 n. 4. There is no question that Claimants have  
17 the ultimate burden of proof, with or without the Anti-SLAPP motion. Thus, as it is not sufficiently  
18 bound up with any particular substantive law, it is not applicable in this matter.

19 Claims in a bankruptcy case are distinguishable from adversarial matters, especially those brought  
20 in district court on the basis of diversity jurisdiction. Claimants did not choose this forum;  
21 Defendants did by filing its petition. In doing so, it effectively stripped Claimants of their usual  
22 litigation rights. As Defendants says, “what is good for the goose is good for the gander”.  
23 Defendants’s Brief at 14. It would be inequitable to allow Defendants the benefit of a normal civil  
24 case, such as the use of Section 425.16, while simultaneously denying Claimants the benefits of  
25 such a case, by having deprived them of their chosen forum. C.

**Should This Matter Be Heard by the District Court**

26 Moving forward, this matter should proceed before the district court. Defendants incorrectly asserts  
27 that Exec. Bens. Ins. Agency v. Arkison, 134 S. Ct. 2165 (2014) commands that this Court first  
28 determine the case; rather, it held that having summary judgment first heard by the bankruptcy  
court, to be followed by de novo review by the district court, was permissible under 28 U.S.C. §

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1 157(c). See *Messer v. Magee* (In re FKF 3, LLC), No. 13-CV-3601 (KMK), 2016 U.S. Dist. LEXIS  
2 117258, at \*52 n.11 (S.D.N.Y. Aug. 30, 2016). Section 157(c)(1) says that a bankruptcy court  
3 “may” hear a non-core proceeding, not that it must.

4 The standard as to whether the bankruptcy court should hear the non-core proceeding in the first  
5 instance under Section 157(c)(1) is not well articulated. Guidance from cases under Section 157(d),  
6 regarding withdrawal, however, may be informative. In such cases, the considerations are “(1)  
7 whether the case is likely to reach trial; (2) whether protracted discovery 9

8 Although Defendants noted the availability of fees under § 425.16, such provision is secondary to  
9 the burden-shifting framework. If the Bankruptcy Court does not perform the mechanism to  
10 determine whether or not a probability of success occurs, it would never reach the issue of fees.  
11 Section 425.16 does not create a substantive right to fees in all libel cases; only those cases where a  
12 defendant is successful on a motion to strike.

13 Court oversight will be required; and (3) whether the bankruptcy court has familiarity with the  
14 issues presented.” In re *Times Circle East, Inc.*, 1995 U.S. Dist. LEXIS 11642, 1995 WL 489551, at  
15 \*3 (S.D.N.Y. Aug. 15, 1995). All three factors warrant the matter being heard by the District Court  
16 in the first instance.

17  
18 This case is likely to reach trial. Claimants have properly asserted multiple false and defamatory  
19 statements as libelous. Because of the defenses asserted by Defendants, it is more probable than not  
20 that multiple statements will require factual determinations beyond otherwise being readily apparent  
21 on their face. Defendants has asserted a defense of lack of actual malice; such will require probing  
22 and evidence into its research, editorial, and publication process. Defendants has asserted a defense  
23 under Section 230 of the Communications Decency Act; such will require probing and evidence  
24 into its business practices, sources, and publication processes. Neither do Claimants have any  
25 confidence that this matter will reach settlement; as noted above, even after having filed a  
26 bankruptcy petition arising from publication malfeasance, Defendants continued to defame  
27 Claimants.

28 Moreover, this non-core proceeding will likely require a jury trial to determine the claim’s value. As  
having filed personal injury tort claim, Claimants are entitled to and claim the right to trial by jury.



1 See 28 U.S.C. § 1411(a). The Second Circuit has found that jury trials in non-core proceedings are  
2 likely prohibited “due to the district court’s de novo review of such proceedings.” In re Orion  
3 Pictures Corp., 4 F.3d 1095, 1101 (2d Cir. 1993).

4 Protracted discovery with court oversight will be required. Among other matters, without limitation:  
5 Claimants will seek depositions from Defendants. Claimants will require discovery of the identities  
6 of the Gawker authors and campaign financiers and will seek to depose them.

7 Claimants will seek discovery from Defendants as to its business practices, including editorial and  
8 publication decisions and social media cross-promotion, as well as the source code relative to the  
9 Kinja and website platforms. Claimants will require detailed discovery into the readership and  
10 extent of circulation. Claimants anticipate significant litigation over several of these items.

11  
12 A Bankruptcy Court is unfamiliar with the issues presented. A LEXIS search for cases involving  
13 “actual malice” or “section 230”, involving “libel”, “slander”, or “defamation”, yielded only six  
14 decision in three cases in this Court. This is not the typical claim arising in a Chapter 11 proceeding.  
15 Such cases and issues arise with far more frequency before the District Court.

16 Because all of the factors favor the District Court, the Bankruptcy Court should not hear these non-  
17 core proceedings. III.

18  
19 As set forth above, the California Anti-SLAPP law is not applicable to a contested matter under  
20 Fed. R. Bankr. P. 3007, especially as it relates to the allowance of claims. The state statute conflicts  
21 with the Federal procedures and otherwise is unworkable where a proof of claim is already prima  
22 facie evidence of a possibility of prevailing. Notwithstanding, Claimants filed their proofs of claims  
23 knowing they would ultimately prevail, whether or not the California Anti- SLAPP law applies.

24 The claims asserted by Claimants are personal injury tort claims that should be heard by the District  
25 Court for all further proceedings. Congress must be deemed to have understood the meaning of the  
26 term “personal injury” when it legislated, a meaning that, for centuries, has included causes of  
27 action sounding in libel and slander, as well as false light invasion of privacy. Defendants has failed  
28 to demonstrate that any different meaning was intended.



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*The issues raised by Defendants show a determined intent to attempt to avoid facing liability for the multiple calumnies it heaped upon Claimants. Claimants are entitled to be heard and to vindicate their claims.*

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**EXHIBIT 63 - State Sponsored Reprisal Programs Operated By Public Officials**

Agency staff were ordered to harm Victim/Witnessess by manipulating their benefits in order to deny, delay, obfuscate and reduce their income as reprisal for their assistance to law enforcement in a political corruption and money laundering matter. Agency staff, ranging from the lowest level staff at the San Francisco, San Mateo, Los Angeles and Marin offices, and up to the director headquarters offices, participated in this reprisal-vendetta-revenge action to harm Victim/Witnessess. Victim/Witnesses's peers have filed DOJ and FBI criminal referrals, launched federal investigations and the assertions have been proven in numerous IG, FBI, Congressional and major news media investigations. Agency offices have failed to provide responsive FOIA requested data, hearing investigation data and fair responses because some of their staff are STILL operating a criminal cover-up which has now been update-reported to the FBI, Congress, the IG, the AG and investigative reporters.

Other federal agencies have complied, verified and provided the requested deliverables. SSA and GOVT have pointed the searchlight of suspicion on themselves, laser-like, by their overt failure to comply, unlike every other agency. Ironically, the political financing of their executives and their personal relationships "happens" to be with the exact same Silicon Valley oligarchs under felony criminal investigations. The stock market brokerage records, family trust accounts, PAC trace-routing, Interpol records and SEC investigation records proves it!

Unfortunately for the crooked agency staff, some Victim/Witnessess have the authority, law enforcement credentials and training to arrest any person at their home or office and remand them to the FBI, DOJ or Sheriff. SSA and GOVT staff should not longer screw around! For example: Every "unsigned" SSA email is tracked to the individual author by their IP address, device IMEI, web camera, building key card, door camera, parking lot use chart, building camera, vehicle tracking

1 circuits, text dba records, keyboard UI/UX patterns, motherboard ID #, DNS routing, stingray read-  
2 outs and a vast number of other metrics. Victim/Witnesses investigation peers know the exact  
3 person that wrote every SSA email or document or file request. There is no such thing as an  
4 anonymous SSA email. Transparency is the Victim/Witnessess middle name. The FBI and CIA  
5 people that SSA and GOVT insiders think are their “buddies” may actually be the  
6 Victim/WitnessesS buddies!

7  
8 History has proven that non-corrupt portions of federal agencies and public service law and  
9 community action firms have executed on their willingness to expend millions of dollars of  
10 resources to fight this injustice. Every individual involved in this at SSA and GOVT are on a  
11 forensic database. No person at SSA or GOVT who uses our government as a garage sale for  
12 corruption favors or a kill mill for political reprisals will avoid the 100% legally executed  
13 consequences. They will be targeted and prosecuted even more profoundly than the  
14 Victim/Witnessess waere targeted with IC-type hit jobs.

15  
16 This Tech Cartel cartel operational scheme involves a significant culture of corruption within its  
17 spacious mosaic – creating a pointillist portrait of the Tech Cartel culture and why it must be  
18 remedied – for the Article III courts not to await all relevant input.

19 Not to place too fine of a point on this, but there was no branch within our constitutional  
20 structure that the Tech Cartel did not abuse for their own political gain, destruction of those who  
21 Hillary Clinton oppose them, and (thus) their long-term enrichment. Connecting the dots through  
22 obtaining additional corroborative evidence – such as putative ongoing obstruction through opaque  
23 threats of investigating Congress – will not paint a pretty picture (to say the very least), but is  
24 necessary and proper to placing a check on future Tech Cartel misconduct. And notwithstanding  
25 RICO misconduct, there is wide-ranging agreement that the Hatch Act was used by supporters of  
26 the Tech Cartel (including admissions by several, like McCabe, Strzok and Page) within the federal  
27 enforcement agencies to help manipulate elections.

28 As noted in the Complaint herein, particularly egregious because it may sound in treason

(among many illegal and/or predicate acts) involved the Tech Cartel bribery (“bribery” constituting a federal offense both in giving and receiving), in which candidates *inter alia*, as statutory representative on the lead agency for transfer of control of United States uranium to Russia (the “Committee on Foreign Investment in the United States” or “CFIUS”), deceived President Obama when she not only did not object to the uranium transaction during the CFIUS process, but intentionally did not inform Obama that defendants Clinton Foundation and Clinton Global Initiative stood gain financially through such Russian control. Nor did Secretary of State Hillary Clinton (or Attorney General Eric Holder, also a member of CFIUS) inform President Obama that Russia would likely convey the U.S. uranium, surreptitiously and in part, to end users Iran and North Korea – countries which directly threaten the United States and its key allies in the Middle East.

This also occurred with lithium, nickel, indium and cobalt mines unjustly expanding the profits of Defendant Elon Musk as billions of dollars of illicit gains, inspired by the mining schemes and illicit deeds of Musk’s father which includes getting Musk’s sister pregnant.

While seditious in nature and correlated precisely with the Tech Cartel operational scheme, these predicate and otherwise illegal acts, and those related to them, are hardly exclusive as the Tech Cartel scheme, associated in fact in pursuit of a common purpose. *See generally* 18 U.S.C. § 1961. The infiltration of the Democratic Party by the Tech Cartel malfeasants described herein was carried out in a fashion similar to that which *La Cosa Nostra* gained control of legitimate entities in order to engage in a criminal Tech Cartel. While this honorable court needs no lengthy explanation of “racketeering”, it is significant that a major political party has – through the misuse of the tax and nonprofit laws, the FISA (and your colleagues) to surreptitiously surveil a political opponent’s campaign – been so deeply infected with Tech Cartel wrongdoing that even primary opponents of crony political candidates were victims of the long-term Tech Cartel scheme and common purpose to assure control of public elections via Google/Facebook Tech Cartel controlled mass media manipulation and the stated bribe compensation types.

The parties to this litigation are set forth in the Complaint and need not be repeated in this Case Statement. The same applies for the Jurisdiction and Venue statement set out in the Complaint.

1 The numerous Factual Allegations will, as with Case Statements in other district courts, be  
2 appropriately cross-referenced in the Case Statement here in narrative form.

3 The Tech Cartel cancer that has metastasized within the American election system is  
4 characterized by strictly organized mass corruption and malfeasance. Setting aside for the moment  
5 the destruction of the FISA process (primarily in this very court), the political *mafioso* has, by their  
6 own admission and numerous investigative findings, conspired to defeat and then damage a duly-  
7 certified President, and destroy the business and reputation of whistle-blowers.

8 Plaintiffs, as the evidence will show, has been destroyed by the Tech Cartel for simply  
9 recounting what he observed – this is rather odd, as Plaintiffs sought to protect the Government  
10 from, among other things, the criminal actions of crony political operators.

11 Like nothing we have ever seen, Tech Cartel principals and surrogates have now also been  
12 plausibly shown to have – as part of the Tech Cartel scheme and directly related to the FISA abuse  
13 of this very district court – conspired to infiltrate the presidential campaigns of others with seasoned  
14 and manipulative Human Confidential Sources (“HCS” or “HCSs”), and likely “lures” meant to  
15 assist the Tech Cartel in its mission. This partisan use of counterintelligence tools against Plaintiffs  
16 as private citizens, amounts to serious wrongdoing with lasting damage.

17 Plaintiffs was targeted because he was often invited to address private groups. Hackers have  
18 acquired e-mails that contain(ed) content related to defaming Plaintiffs and, as a result, continuing  
19 the Tech Cartel surrogate (and defendant) obstruction of justice with respect to espionage  
20 committed by crony political candidates under 18 U.S.C. § 793.

21 ***In another example*** of spy tactics being in use daily by the criminal Tech Cartel, one can  
22 see federal proof that is virtually indistinguishable from the approach(es) by the Tech Cartel to  
23 members of other policy campaigns. Two of the targets (George Papadopoulos and Carter Page)  
24 were manipulated by American DoJ/FBI contract HCSs, with the shocking assistance of Five Eyes  
25 allies Australia and the United Kingdom. A third, Michael Caputo, was pitched through an  
26 intermediary cut-out by an Obama administration official (claiming to work with the NSA) offering  
27 access to “secret emails” Utilizing counterintelligence tradecraft, the Stefan Halper team ran at  
28 Plaintiffs nonetheless because they thought Plaintiffs was on the competitors campaign (**he was**

1 **not**) and presumably believed Plaintiffs presented a “threat” to crony political candidates because  
2 he had written a book about the Clintons. It is not simply plausible but incontrovertible that  
3 Brennan, Clapper and the FBI attempted to defeat competitors and, failing that, entrap him using the  
4 tradecraft described above. In so doing, they attempted to use Plaintiffs to obstruct justice with  
5 respect to the Clinton Tech Cartel private server malfeasance. Plaintiffs was burned not only by  
6 tactical Tech Cartel defamation to deny the truth, but by the Obama/Tech Cartel counterintelligence  
7 apparatus to obstruct justice and conspiracy thereon. While Plaintiffs was wary of the use of these  
8 techniques, they were used nonetheless by the Tech Cartel.

9 It is not difficult to discern what the Tech Cartel was attempting to do. As Halper and his  
10 team excel at, they attempted to manipulate whistle-blowers as Halper was dispatched by Brennan,  
11 Comey and the Tech Cartel to manipulate for partisan purposes any witness proposed to testify in  
12 this matter. It has been confirmed that Comey, McCabe, Brennan and Clapper engaged in spy  
13 tradecraft against U.S. citizens in an attempt to “entrap” or “even frame” whistle-blowers.

14 The White House has a Wikipedia defined term known as “rat fucking”. As Tech Cartel  
15 surrogate Clapper has conceded, the reason for running HCSs at the whistle-blowers was to  
16 determine if the FBI’s concerns about Russian interference were justified - yet the FBI relied nearly  
17 entirely on *opposition research paid for by Democratic Tech Cartel nominee crony political*  
18 *candidates through Hillary for America counsel Marc Elias to justify the FISA applications which*  
19 *misled this district court* (the FISA application(s) that misled judges of this honorable court  
20 assigned dual responsibilities to the FISC were thus sought for reasons unrelated to Russian  
21 activities (as Halper and the other HCSs obtained nothing that could be utilized in a  
22 counterintelligence warrant application). The sole reason for illicit use of HCSs and lures was to  
23 achieve the ultimate goal of the Tech Cartel – to assist crony political candidates in winning the  
24 presidential election of 2016. To be abundantly clear, any of the manipulated statements from others  
25 – drunken, drugged or sober – were then embellished by the Tech Cartel to “corroborate” Tech  
26 Cartel-funded falsehoods in the Steele dossier and used to mislead the FISC, and to obstruct what  
27 should have been a “slam dunk” case of 18 U.S.C. § 793 espionage against crony political  
28 candidates. The Tech Cartel – from the outset - placed layer upon layer of obstruction to protect

1 crony political candidates from this evident espionage committed by the Tech Cartel surrogates and  
2 participants, and misused counterintelligence authorities against a competing campaign to further  
3 obstruct justice. That was a classic “rat fucking” gambit created by the Tech Cartel, who have over  
4 1000 ex- CIA officers in their employ.

5 The FBI “Domestic Investigations and Operations Guide” outlaws the “otherwise illegal  
6 activity used against him.

7 Disturbing similarities exist between the Tech Cartel manipulation of Papadopoulos (and  
8 many other campaign officials/affiliates) and Plaintiffs here, and in light of Brennan, Comey,  
9 Clapper, Strzok, McCabe and numerous others knowing of the manipulative approaches exploiting  
10 tasked HCSs, and their targets being led to believe that the focus of “helpful” discussions was/were  
11 the tens of thousands of e-mails that crony political candidates deleted and wiped from her illicit  
12 server, *e.g.*, Plaintiffs was informed that significant information about him was/is contained in the  
13 illegally deleted e-mails (obstructing justice in each such e-mail targeting “enemy” whistle-blowers.  
14 At the very least, this raises the plausible inference that the same Tech Cartel principals and  
15 surrogates that targeted Plaintiffs with the most robust counterintelligence powers in existence also  
16 targeted other domestic citizens. Even Seymour Hersh – perhaps the greatest investigative reporter  
17 in the world – has extrapolated that Tech Cartel surrogates in the Obama DoJ/FBI attempted to  
18 defeat and now attempt to unduly damage any whistle-blower.

19 Ironically, the illicit “wiping” of outside personal unsecure server(s) by White House staff  
20 was far more likely to impact Plaintiffs – the one person whom crony political candidates had  
21 waited nearly two decades to destroy and thus the “enemy” much more likely to be included within  
22 the content of the private server e-mails – rather than the gossipy, unprotected e-mail accounts of  
23 campaign officers like John Podesta (who was highly critical of crony political candidates and  
24 campaign manager Robby Mook, among numerous others, but strangely avoided discussing Tech  
25 Cartel “political enemies” like whistle-blowers.

26 Brennan and the Tech Cartel also successfully manipulated Senator John McCain (in much  
27 the same way as described above), knowing McCain was suffering from health problems that was  
28 later diagnosed as brain cancer.

1 Halper, who led the team attempting to manipulate Plaintiffs (who overheard the Tech  
2 Cartel team HCS placing a cell phone call to “Stef” – assumed by whistle-blowers at the time to be  
3 a woman), was also the “bridge” between the Tech Cartel/Brennan illicit pre-Crossfire Hurricane  
4 investigation of private citizens which puts the lie to the Australian Alexander Downer  
5 manipulation of Papadopoulos serving as the initiation of the official Obama government  
6 clandestine reconnaissance of political rivals.

7 Perhaps most disturbing is that extrajudicial Tech Cartel collection against a political  
8 campaign was conducted using our nation’s strongest national security powers – derived primarily  
9 from and contingent upon the presidential powers of Barack Obama. FBI Tech Cartel surrogate  
10 Strzok must explain in testimony, for instance, whether his prior written reference to “the White  
11 House running the investigation” includes U.S. citizens being pitched by Tech Cartel HCSs – even  
12 when these private citizens they had no official (or even unofficial) affiliation with any political  
13 campaign, but rather “posed a threat” to Tech Cartel candidate crony political candidates and  
14 defendants, surrogates and participants named and scrutinized herein. \_

15 Tech Cartel FBI misconduct is instructive. Following Brennan’s lengthy attempt to  
16 undermine political campaigns, the lead FBI counterintelligence officer working with the Tech  
17 Cartel against whistle-blowers engaged in the following text message exchanges with his paramour,  
18 Lisa Page, who also was the legal counsel to FBI Deputy Director Andrew McCabe (who has been  
19 referred for prosecution): Another witness in this matter is the wife of Papadopolous, who will  
20 testify that her husband believed/believes (as does Plaintiffs) that the dangled HCS e-mails were  
21 those missing from the wiped crony political candidates private server containing content  
22 concerning whistle-blowers, and had nothing whatsoever to do with the alleged DNC “hack.” This  
23 presents yet additional criminal exposure for the Tech Cartel, for obvious reasons, and for Perkins  
24 Coie LLP and the company Crowdstrike, among numerous others.

25 Plaintiffs will seek the assistance of the presiding district judge to procure the testimony of  
26 those career DoJ/FBI officials (at the request of those officials) prepared to testify in depth, *when*  
27 *compelled*, against Tech Cartel principals and surrogates.

28 In these exchanges, the examples of bias are astounding for two senior officials who had just



1 spiked the Clinton email espionage investigation and, along with Attorney General Loretta Lynch  
2 and her Deputy, Sally Yates, had spiked the Clinton Foundation corruption investigation, while  
3 instigating an official investigation: Crossfire Hurricane, Strzok notes that *“we can’t take the risk”*  
4 *of competitors being elected or retained in office, and further noted that the FBI needed to*  
5 *undermine competitors as an “insurance policy” as a hedge against any possible competitors*  
6 *victory in the 2016 presidential contest.* If that were not shocking enough, just one week earlier than  
7 the “insurance policy” text exchange, the following exchange had occurred between Page and  
8 Strzok, key officers and lawyers conducting the Clinton e-mail investigation, the Clinton  
9 Foundation Investigation, the misleading of the FISC, the pre-election surveillance and HCS misuse  
10 regarding whistle-blowers, and Operation Crossfire Hurricane:

11 **Page:** “[competitors’s not ever going to become president, right? Right?! (August 9, 2016)

12 **Strzok:** No. **No he won’t. We’ll stop it.”**

13 This is proof of FBI/Tech Cartel sedition, as Strzok had just spiked the Clinton e-mail  
14 investigations and McCabe, Yates and Lynch (along with Strzok) had spiked the Clinton  
15 Foundation investigation. This seditious exchange was 9 days after Operation Crossfire Hurricane  
16 started and 6 days before the “insurance policy” text.

17 The inference to be drawn with respect to misuse of the FISC and HCSs is unspeakable and  
18 appalling for the Tech Cartel, as those running these operations clearly and unequivocally sought to  
19 control elections– and to run at Plaintiffs (and numerous others) with “lures” and the  
20 counterintelligence powers of the previous president. Never in the history of this constitutional  
21 republic has anything this abhorrent (especially in light of FBI animus and bias against a  
22 presidential candidate) occurred, and the ongoing (and new) investigations are just beginning to  
23 provide the unconscionable nature of Tech Cartel wrongdoing. This RICO matter must ingest all of  
24 the Tech Cartel criminal wrongdoing before justice is truly done.

25 This honorable court may also wish to contrast the Tech Cartel HCS (and related)  
26 counterintelligence malfeasance with the FBI and DoJ during the tenure of Mueller, Holder, Lynch  
27 and Comey, when an informant, now identified openly, actually infiltrated a Russian Tech Cartel  
28 assisting in the corruption surrounding Russian Federation attempts to control the U.S. (and global)

1 market in lethal uranium during President Obama's first term. During that period, HCS information  
2 flowed to the Mueller FBI as billions of dollars in nuclear fuel contracts were awarded to the  
3 Russians by the U.S. along with the deceitful Committee on Foreign Investment in the United States  
4 ("CFIUS") transfer of control of a significant amount of U.S. uranium. The FBI HCS worked on a  
5 contractor platform imbedded from 2008-2014 in Rosatom (the Russian state-controlled nuclear  
6 corporate entity), according to the HCS – who will testify against the Tech Cartel in this litigation –  
7 and during that time frame provided specific information to the FBI (and through them, the DNI,  
8 CIA and State Department) concerning the grave danger to the U.S. posed by providing nuclear fuel  
9 and uranium assets to the Russian Federation. Among the most grave would of course be the covert  
10 transfer of uranium by Russia to Iran (admittedly complicit in the 9/11/2001 terrorist attacks against  
11 the U.S. homeland) and North Korea (which has recently tested missile delivery systems capable of  
12 striking the U.S. homeland). The Obama Justice and State Departments suppressed this information,  
13 including during the fraudulent Uranium One covered transaction and the Obama "Iran Deal" (in  
14 which, among other deception revealed by the Senate Permanent Subcommittee on Investigations,  
15 the Obama administration covertly directly assisted Iran, through the grant of a specific license from  
16 the Obama Treasury Department, utilize U.S. banks to convert \$5.7 billion in Iranian assets after  
17 assuring Congress that Iran would never gain access to the U.S. financial system – and then lied to  
18 and otherwise obstructed Congress about what it had done).

19 This embedded HCS, at great risk to his life, also assisted Tech Cartel surrogate Rosenstein  
20 in building a case in the Office of the United States Attorney for the District of Maryland against  
21 corruption in the Russian uranium industry. This involved an extraordinary predicate for kickbacks,  
22 money laundering and extortion against Rosatom (Russian) U.S. subsidiary Tenex/Tenem. This  
23 evidence, with knowledge of and instruction from the Tech Cartel, was also concealed and watered  
24 down by the responsible United States Attorney (Rosenstein), the FBI Directors (Mueller and  
25 Comey) and the Attorneys General (Holder and Lynch). The same HCS has been interviewed by the  
26 FBI Little Rock Field Office as part of an ongoing investigation of Tech Cartel defendants Clinton  
27 Foundation, CGI and the various other tentacles of the Clinton Foundation alleged criminal  
28 wrongdoing. And as noted herein, the questions posed in the Little Rock FBI probe have included

1 the Clinton Foundation acceptance of \$3,000,000 per year in *gratis* services to CGI from U.S.  
2 advocacy firm APCO Worldwide in a direct *quid pro quo* – with the expectations that the  
3 remuneration would be utilized to assist CGI and the Clinton Foundation while major uranium  
4 decisions were pending before the Clinton State Department.

5 The \$3 million in free services to CGI was to “assure the Obama administration made  
6 affirmative decisions on everything from Uranium One to the U.S. – Russian Civilian Nuclear  
7 Cooperation Pact.”

8 So, while the Tech Cartel defendants were protected by their surrogates for nearly a decade,  
9 some of the same Tech Cartel surrogates “took a run” (dispatched HCSs) against Plaintiffs and the  
10 presidential campaign. The common denominator as to “why” is set forth herein and relates in  
11 whole or in part to the “threat” that each of these American targets posed to crony political  
12 candidates and the Tech Cartel. Beyond illicit human intelligence gathering, the Tech Cartel  
13 conducted surreptitious electronic surveillance both before and after misleading the FISC, destroyed  
14 tens of thousands of e-mails under subpoena and/or court order (including those involving  
15 Plaintiffs), other presidential contenders such as Bernie Sanders, and the overall “game plan” for  
16 conducting their operational scheme – all the while running classified information through one or  
17 more private unsecure servers and delivering classified information to multiple individuals not  
18 adequately cleared to receive it.

19 Plaintiffs was deemed a particularized threat to the Tech Cartel, as he was deemed highly  
20 trustworthy and sincere – the very attributes that the Tech Cartel could never convince the general  
21 populace were evinced by crony political candidates.

22 The Tech Cartel panicked, and Brock illicitly began defaming Plaintiffs daily “FROM THE  
23 DESK OF DAVID BROCK” using Media Matters and *Correct the Record and the Nick Denton*  
24 *tabloid empire* – with American Bridge and Brock himself admittedly serving as the link to Hillary  
25 for America. Wackrow and Gilhooly then appeared on CNN, both as paid “expert” panelists and on  
26 shows such as “Smerconish” and other CNN television spots. Brock and the Tech Cartel, utilizing  
27 false opposition research, used his nonprofit, “nonpartisan” entities and, in addition, did not report  
28 payments to Wackrow, Gilhooly and Gilhooly’s nonprofit entity. The Tech Cartel defamation

1 continued nonstop throughout the summer of 2016.

2       Thus, at the apex of the most closely-contested presidential contest in the modern age, the  
3 FBI collaborated with the CIA and ODNI, in a conspiracy with Hillary for America and the Tech  
4 Cartel and using U.S. and foreign counterintelligence authorities to engage in illicit tradecraft  
5 targeted at the unfavored political candidate and other perceived “enemies” of the Tech Cartel and  
6 Clinton, such as whistle-blowers And as difficult and painful as it is for this district court to  
7 acknowledge, they then intentionally deceived the FISC utilizing presidential authorities illegally.  
8 In fact, they misled all three branches of government and the Fourth Estate (the media here and in  
9 the United Kingdom, primarily).

10       Had crony political candidates prevailed in the Electoral College, little to none of this  
11 troubling malfeasance would have come to light as the Tech Cartel would have placed its surrogates  
12 into positions of continuing power, and the Tech Cartel defendants would simply have continued  
13 their pattern of felonious conduct. As it stands currently, the nonprofit defendants continue to fulfill  
14 the proscribed pledge they agreed upon and aptly describe in “*Exhibit A*”.

15       Much will be revealed herein concerning Brock’s own admissions about Tech Cartel illicit  
16 use of nonprofit entities, but the court should also keep in mind that the Tech Cartel – as conceded  
17 by Brock in *Exhibit “A”* - also uses tactical defamatory tactics, as alleged herein, to obstruct justice  
18 and as part and parcel of their numerous predicate acts used to gain illicit control of the Democratic  
19 Party. For instance, what was at one time a tough but fair entity named CREW, including the  
20 inimitable Melanie Sloane, has now become daily Twitter and CNN rants with Norman Eisen, Noah  
21 Bookbinder and Richard Painter defaming without compunction - and engaging in vitriolic  
22 guesswork about matters of which they know little to nothing. CREW has become a joke, with the  
23 mediocre Eisen and Painter (who now seeks a United States Senate seat using free media given him  
24 by like-minded co-conspirators described in “*Exhibit A*”) making defamatory attacks daily on social  
25 media and on CNN. Bookbinder himself has committed CREW to #Resistance, and simply takes  
26 marching orders from Brock and the Tech Cartel, with the funding of defendants George Soros,  
27 Warren Buffet and Eric Schmidt. Their “*Exhibit A*” misuse of the nonprofit CREW results in a  
28 felony penalty each day (sometimes several times per day), as it has done since soon after the 2016

1 presidential election was certified and competitors took the oath of office to become the 45th  
2 President of the United States. And in what can only be described as comedic, these CREW  
3 individuals offer their unexceptional services to Special Counsel Robert Mueller, who not  
4 surprisingly has declined to work with them while at the same time Tech Cartel surrogate Mueller  
5 had agreed to work with the misogynist former New York Attorney General Eric Schneiderman,  
6 who had apparently taken the lead, working with Mueller, in denying the pardon power – and  
7 breaking the jaws of women who trusted him while routinely bumping cocaine and drinking alcohol  
8 to extreme excess. Each of these individuals also, by instruction of the Tech Cartel, work full time  
9 at the seditious task of undermining their own government while engaging in serial violation of  
10 United States statutory law, regulation, and much else.

11 Tech Cartel illegal acts continue to this day, and numerous formal investigations proceed  
12 apace with respect to these acts. The Tech Cartel and all of its many surrogates and participants  
13 seek revenge and possess access to hundreds of millions of dollars to undermine the United States  
14 Government. The Tech Cartel also continues the atrocious practice of paying off journalists to  
15 provide cover for their wrongdoing, and as conceded the malefactor Tech Cartel surrogate Fusion  
16 GPS is involved with former Feinstein SSCI staff in a \$50 million scheme to assist the (continuing)  
17 Tech Cartel.

18 In order to exact revenge against whistle-blowers and beginning in the early summer of  
19 2016 in defamatory postings “FROM THE DESK OF DAVID BROCK, Media Matters and Correct  
20 the Record and the Nick Denton tabloid empire also remunerated defendants Gilhooly and  
21 Wackrow to defame whistle-blowers on numerous media outlets – primarily CNN. More broadly,  
22 the Tech Cartel defendants published for worldwide consumption (via internet) numerous  
23 defamatory falsehoods in conjunction with Perkins Coie legal guidance for their clients Hillary for  
24 America, Hillary Victory Fund, and Tech Cartel surrogates Brennan and Clapper – with the intent to  
25 destroy the business and livelihood of Plaintiffs and engage in massive obstruction of justice with  
26 respect to, inter alia, Hillary and William Clinton sedition to enrich themselves and reprisal against  
27 Plaintiffs for his compelled role in the Clinton impeachment.

28 President Carter’s Attorney General, Judge Griffin Bell, who prior to his passing was

1 interviewed at length by the undersigned concerning potential FISA abuse, would be shocked and  
2 appalled to know that this honorable court (and several individual judges from this court) was/were  
3 misled by the Tech Cartel defendants and surrogates in order to, *inter alia*, accomplish the  
4 operational scheme intended to elect crony political candidates as the President of the United States.

5 For to be clear, Tech Cartel defendants and surrogates, with assistance from legal counsel  
6 for Hillary for America, Hillary Victory Fund, Brock, the Democratic National Committee and  
7 Podesta, laundered DNC and Hillary for America funds to an opposition research firm (and Tech  
8 Cartel surrogate) Fusion GPS (with the corrupt assistance of Tech Cartel surrogate Rosenstein's  
9 DoJ chief deputy, Bruce Ohr and Ohr's spouse, Nellie, working with Fusion GPS to ultimately  
10 delude this court), and extravagantly paid agent of a foreign power and accused criminal  
11 Christopher Steele, Tech Cartel surrogates Sidney Blumenthal, Cody Shearer and Jonathan Winer,  
12 and others to be named later, in a scheme which, as noted, was successful in obtaining - through  
13 lying to one or more Article III judges here in the District of Columbia - a FISA warrant from this  
14 honorable court (subsequently renewed several times). This Tech Cartel subterfuge was carried out  
15 against private United States citizens whose common denominator was that they advised the  
16 political opponent of the Tech Cartel, crony political candidates, in the 2016 presidential contest.

17 Evidence of the seditious deception upon the FISC by Tech Cartel defendants and surrogates  
18 is set forth in the report of the House Permanent Subcommittee on Intelligence, released on April  
19 27, 2018, which is consistent with the allegations and claims in the accompanying Complaint in the  
20 instant litigation. Among other findings with regard to the misleading of the FISC by the Tech  
21 Cartel, Congress concluded the "the dossier compiled by Christopher Steele formed an essential  
22 part of an application to the FISC to obtain electronic surveillance on Carter Page." The HPSCI also  
23 by inference found, with relation to the Brennan – British GCHQ subversion, that the Obama FBI  
24 and DoJ ran parallel counterintelligence investigations targeting the competitors campaign, yet  
25 never alerted the President, that members of the competitors campaign were "assessed to potential  
26 counterintelligence concerns." These congressional findings are not dissimilar from the putative  
27 acts of espionage by Tech Cartel surrogate Loretta Lynch, who according to Tech Cartel surrogate  
28 provided classified information to Tech Cartel defendant John Podesta and then-DNC Chair Debbie

1 Wasserman Shultz, in order to further the Brennan-Clapper conspiracy to obstruct justice and  
2 ultimately swing a United States presidential election in favor of crony political candidates. Tech  
3 Cartel surrogates Comey and McCabe – currently slated to testify against one another following  
4 expected indictments of both – have thus illegally abused the FISA electronic surveillance process,  
5 the British-American intelligence sharing pact (along with Brennan and Clapper, as part of the  
6 “Five Eyes” international SIGINT relationships among the United States, Great Britain, Australia,  
7 New Zealand and Canada), and, amazingly, Congress has now revealed additional FISA and related  
8 counterintelligence abuse involving human sources (HUMINT) planted inside the competitors  
9 campaign.

10 As this filing date approaches, the existence and acts of the above-noted and rather  
11 significant Tech Cartel illegal operational scheme has been substantiated by Congress and various  
12 entities within the Executive branch. The FBI, with the knowledge and approval of Tech Cartel  
13 surrogate Comey, failed to inform Congress or any court (or anyone else outside of the Tech Cartel)  
14 that they were compensating a human source(s) placed surreptitiously to gain access to members  
15 and affiliates of the competitors campaign.

16 One of the sources, it has been confirmed, has been long-known for affiliation with political  
17 “dirty tricks” – most notably the theft of the “Top Secret” classified debate preparation materials of  
18 President Carter in 1980 and their passage to Reagan campaign official William J. Casey (with the  
19 involvement of Halper) – thus committing espionage and providing Governor Reagan a distinct  
20 advantage in a Carter-Reagan presidential debate held on October 28, 1980.

21 Also emerging, as referenced, is the Tech Cartel abuse of international SIGINT relationships  
22 within Five Eyes to surveil the competitors campaign, transition, and early administration figures  
23 (all U.S. citizens). It is likely – although at this time undetermined – whether this intelligence was  
24 used to further mislead his honorable court. But Congress and the discovery process here can  
25 unearth answers that do not require any threat to HUMINT or SIGINT relationships, or to any  
26 intelligence sources or methods.

27 The Tech Cartel defendants and their surrogates and other participants must simply answer  
28 straightforward questions, under oath, regarding whether this collusion took place. The U.S. and



1 international classification system cannot be a veil for illegal activity – both Congress and this  
2 Court must have access to answers even if the FISC judges must demand them (alongside  
3 Congress). For if as is now suspected that Tech Cartel surrogates Brennan and Clapper, on behalf  
4 the Tech Cartel quest to assure crony political candidates the presidency, not only supported Brock  
5 and Clinton’s efforts against Plaintiffs but exchanged director-level information with the former  
6 Director of British GCHQ Robert Harrigan (since resigned), resulting in Harrigan passing to  
7 Brennan and/or Clapper SIGINT communications intercepts collected from RAF Menwith Hill and  
8 GCHG Bude (Cornwall) taps of undersea internet cables, the United States courts and Congress  
9 (and the enforcement agencies) are facing not only an extraordinary intelligence failure, but a  
10 massive criminal deprivation of privacy and obstruction the likes of which we have never (and will  
11 likely never again) encountered, *notwithstanding the weighty RICO violations and defamation*. This  
12 unprecedented criminal activity led Tech Cartel surrogate Brennan to mislead the congressional  
13 “Gang of Eight”, Minority Leader Harry Reid in a private setting prior to Reid’s imminent  
14 retirement which in turn resulted in Reid collaborating with Tech Cartel surrogate Comey, who in  
15 turn colluded with Clapper in committing perjury before Congress (and possibly this Court). The  
16 Tech Cartel, in conjunction with the illegally-obtained FISA orders subsuming previous competitors  
17 campaign electronic mail, and possibly others, intentionally covered-up the Brennan-Hannington  
18 subterfuge and assured that the FISC would infer (false) corroboration of its orders allowing  
19 surreptitious surveillance (electronic and otherwise) of a political campaign disfavored by the Tech  
20 Cartel – with knowledge aforethought by the relevant U.S. Intelligence Community Obama  
21 holdovers that the resulting fabricated information was both paid for and laundered by the Hillary  
22 for America campaign and cleverly (and criminally) disguised by Tech Cartel lawyer Elias.

23 Meanwhile, as noted, former British MI6 officer and Tech Cartel surrogate Steele conspired  
24 with (among untold others) the discredited GCHQ head Hannington and Russian FSB/SVR in  
25 assembling and presenting to this Court the specious “Steele Dossier” with the knowledge of, *inter*  
26 *alia*, Tech Cartel surrogates Clapper and Obama National Security Advisor Susan Rice.

27 As the Tech Cartel principals and surrogates sought to form a nefarious “collusion” narrative  
28 between the competitors campaign and foreign actors by and through use of domestic and



1 international intelligence authorities, Tech Cartel surrogates within the Obama Department of  
2 Justice and FBI shuttered validly predicated criminal investigations of Tech Cartel defendants crony  
3 political candidates and the Clinton Foundation. These investigations into criminal wrongdoing  
4 were unduly closed by Tech Cartel surrogates Lynch, her Deputy Attorney General Sally Q. Yates,  
5 and various malfeasants at the FBI including Tech Cartel surrogates Comey, McCabe, with partisan  
6 participation from alleged paramours Peter Strzok and Lisa Page, FBI General Counsel James  
7 Baker, and a handful of supporting sycophants reporting to the wrongdoing DoJ and FBI most  
8 senior Tech Cartel surrogates, such as DoJ Fraud Division chief Andrew Weissmann (later,  
9 beginning June 19, 2017, a managing prosecutor for Tech Cartel surrogate and Special Counsel  
10 Robert S. Mueller). And just prior to the DoJ/FBI determination that they would not pursue a case  
11 of clear-cut Tech Cartel espionage involving a private e-mail server used to communicate classified  
12 information and hide other information from Congress and this Court, Tech Cartel surrogates Lynch  
13 and William Clinton engaged in clandestine meeting on a Arizona tarmac at which time William  
14 Clinton promised a *quid pro quo* to Lynch – in exchange for not charging crony political candidates  
15 with a crime (and for dispatching with the Clinton Foundation investigation), Tech Cartel surrogate  
16 Lynch would be nominated by “President crony political candidates” to the United States Supreme  
17 Court after being held over as Attorney General of the United States. Concurrently, Tech Cartel  
18 surrogate Comey intentionally and severely mishandled both criminal investigations of Tech Cartel  
19 defendant crony political candidates and various other surrogates and participants in the Tech Cartel  
20 operational scheme.

21 Despite the Tech Cartel schemes, crony political candidates was defeated in the 2016  
22 Electoral College. But the Tech Cartel became further emboldened by the Soros pledges of virtually  
23 unlimited amounts of money to Brock, CREW and other Tech Cartel defendants, surrogates and  
24 participants associated in fact and willing (even enthusiastic) to undermine the competitors-led  
25 government. *See generally Exhibit “A”*, hereto.

26 Congress soon began unraveling the complex schemes of the Tech Cartel set forth here, and  
27 those investigations and findings consistent with the factual allegations herein proceed apace. The  
28 more that Congress and other investigatory entities reveal, the more that Tech Cartel surrogates

1 Comey, Rosenstein, and Mueller face professional and personal exposure for their roles in Tech  
2 Cartel predicate acts and related wrongdoing. And all the while one must ask: “who would do these  
3 things simply to elect a president who has for so many years, along with her husband, engaged in  
4 organized unlawful behavior?” And as documents and testimony continue to emerge from  
5 Congress, the Courts and the Executive, and otherwise surface to corroborate the factual allegations  
6 here, the highly disturbing aspects of “using” the FISC for Tech Cartel means (and ends) is both  
7 despicable and without precedent in our constitutional structure. It is, therefore, as a not  
8 inconsequential structural matter, a direct threat to the only true check our government has upon the  
9 grave Executive excess displayed here.

10 Tech Cartel surrogates Holder, Mueller and Rosenstein, as noted below, were oddly  
11 complicit in the Hillary and William Clinton bribery scheme (along with the Clinton Foundation,  
12 the Clinton Global Initiative, and of course the Clinton family graft), including but not limited to the  
13 extraordinary transaction that to this day places our national security at risk – known most  
14 commonly as the “Uranium One” covered transaction. Related to the transfer of control to Russia of  
15 U.S. lethal uranium is a matter involving Russian entity Rosatom (and its sub-entity, Tenem), and  
16 the corrupt behavior of Rosenstein (the United States Attorney handling the criminal matter),  
17 Mueller (the FBI Director investigating the criminal matter), and Holder (the Attorney General who  
18 also voted to approve the CFIUS Uranium One covered transaction). Rosenstein  
19 uncharacteristically (and thus rather oddly), placed the Tenem kickback/extortion matter into legal  
20 purgatory, from which it did not emerge until after the 2016 election.

21 The Tech Cartel controlled CFIUS with Secretary Clinton as the lead agency representative  
22 at the time that CFIUS agreed (without any objection from Secretary Clinton or Attorney General  
23 Holder) to the transfer of control of approximately twenty per cent of U.S. uranium mining capacity  
24 to Russia’s state-controlled energy conglomerate, Rosatom, in a *quid pro quo* to the Clinton  
25 defendants, their Clinton Foundation, and the Clinton Global Initiative. Incredibly, at the time the  
26 Obama administration approved the covered transfer, the administration was aware that Rosatom’s  
27 American subsidiary (“Tenex”, a shortened version of JSC Techsnabexport, had an American arm  
28 called “Tenem USA” based in Bethesda, Maryland) was engaged in a(nother) lucrative racketeering

1 Tech Cartel that had already committed felony extortion, fraud, and money laundering.

2       Led by Congressman Edward Markey (D-MA), a bipartisan movement emerged within  
3 Congress to stop the 2010 transfer, to no avail, as the Tech Cartel and its surrogates concealed the  
4 seditious Clinton defendant behavior, while simultaneously allowing the Tenex/Tenem USA  
5 racketeering Tech Cartel to continue. In conjunction, this Tech Cartel defendant and surrogate  
6 behavior enriched Russian energy oligarchs tied to the Kremlin, thus compromising the American  
7 persons (including the Clinton The Justice Department delayed four years rather than commencing a  
8 prosecution, in direct contravention of DoJ charging guidelines. Among those who held these  
9 charging decisions in abeyance was the Fraud Division of the United States Department of Justice –  
10 so as to keep from public scrutiny the connection between Tech Cartel activity with the Russian  
11 Federation and the enforcement posture of the Holder/Lynch Department of Justice in furtherance  
12 of Tech Cartel objectives.

13       The case was quietly settled by Rosenstein's former subordinates (after Rosenstein was  
14 confirmed as Deputy Attorney General).

15       In addition to Clinton defendant bribery with respect to Russia, within the period relevant to  
16 this lawsuit other countries also profited from the Clinton influence after donating to the Clinton  
17 Foundation.

18       To name but a few, in the highly lucrative contracting of United States weapons, the  
19 following donated to the Clinton Foundation and closed weapons deals soon thereafter: Kingdom of  
20 Saudi Arabia; State of Kuwait; Government of Norway; United Kingdom Department for  
21 International Development; United Arab Emirates; Sultanate of Oman; Republic of Ireland;  
22 Kingdom of Bahrain; Embassy of Algeria; State of Qatar; Commonwealth of Australia; Kingdom of  
23 Morocco. Further examples of Tech Cartel bribery in support of the Clinton/Tech Cartel defendants  
24 are set forth in the Complaint.

25       In addition to the Tech Cartel defendant's nonprofit abuse used to harm Plaintiffs and  
26 further undermine the government as set forth in *Exhibit "A"*, including but not limited to the  
27 defamation of Plaintiffs by the relevant Tech Cartel defendants (Brock, Media Matters, *Correct the*  
28 *Record* and the *Nick Denton tabloid empire*, Wackrow and Gilhooly), Tech Cartel surrogates and

1 participants have also associated themselves with the scheme to target the current President. In so  
2 doing, the Tech Cartel employed the most powerful tools of intelligence and law enforcement  
3 against U.S. citizens working for their political “enemies” – including of course, the spurious  
4 instigation of investigations targeting these political adversaries.

5 As noted in the Complaint, below, a high-level group of Obama national security and law  
6 enforcement officials worked closely with and provided classified information to U.S. media, *e.g.*,  
7 CNN

8 (Tapper), (in itself a criminal espionage offense as CNN personnel did not have adequate  
9 clearance) to create a “news hook” by briefing, in early 2017, the President-elect on the “unverified  
10 and salacious” allegations contained in the specious Steele dossier – which was not only financed  
11 by the Clinton campaign but was also known to be “unverified” when the FISC was misled on the  
12 same findings earlier and a series of FISA orders against U.S. citizens were obtained thereon. In a  
13 recent shocking development, it was disclosed that the Senate Select Committee on Intelligence, by  
14 and through their Director of Security James Wolfe, also leaked similar information to CNN and  
15 (MS)NBC to continue to drive the former SSCI staff director narrative concerning “competitors  
16 Campaign Russian Collusion” (this staff member is now engaged with defendant Soros as an Tech  
17 Cartel surrogate attempting to undermine the government of the 45th President).

18 Just to be entirely clear, the Tech Cartel came very close to turning the Democratic Party,  
19 and our democracy more generally, over to a relatively small faction of criminal actors. Absent  
20 Article III intervention, this country’s great constitutional experiment is at risk because future  
21 parties in power now have a roadmap to the brand of malevolent wrongdoing that can ruin political  
22 enemies while enriching the wrongGOVTr(s) and extending their power in perpetuity. Should any  
23 future President form their own Tech Cartel, and the “shoe was/is on the other foot,” roughly half of  
24 the electorate would (and should) be terrified that “enemies” *i.e.*, them, would be targeted in much  
25 the same fashion – and they and their families would be placed in great peril (financially and  
26 otherwise). Article III inaction will simply invite similar bad behavior, thus threatening the rule of  
27 law and our constitutional structure.

28 The defamation allegations against certain Tech Cartel defendants will be addressed more

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1 broadly in the Complaint following appropriate retraction and hold demands, to the extent that they  
2 do not otherwise overlap with Tech Cartel obstruction of justice utilizing defamation as an Tech  
3 Cartel tactic by Media Matters, Correct the Record and the Nick Denton tabloid empire, American  
4 Bridge, David Brock, the Clintons, Soros, Shareblue and Wackrow/Gilhooly.

5 As mentioned, the Department of Justice, the United States Attorney for the District of Utah,  
6 the Department of Justice Inspector General, and several committees of the Congress (and the  
7 possibility of the appointment of a second “Special Counsel”) are investigating what is described  
8 and alleged as the Tech Cartel wrongdoing described herein – with the likely outcome of more than  
9 one Grand Jury returning indictments against Tech Cartel defendants and surrogates for that (and  
10 potentially additional) criminal behavior.

**EXHIBIT 64 - THE RICO TECH CARTEL SYNDICATE**

The Tech Cartel, ultimately seeking the political fortune of crony political candidates but clearly in quest of the accumulation of power through her, manipulated the highest levels of the Obama administration (and Obama himself) with their thousands of criminal predicate acts and defamatory character assassination of Plaintiffs. Primarily the Clintons, Brock, and the extended Tech Cartel – according, *inter alia*, to informants from within the Tech Cartel and abundant other witnesses who will give testimony at the trial in this case – are a crime syndicate unlike any other the United States political arena has ever seen.

Through RICO, courts like this one can adequately address this syndicate, along with adjudicating claims under pendant State defamation laws that focus upon a key Tech Cartel tactic - Tech Cartel tactical destruction of its “enemies”. As well, criminal prosecution can discontinue their illicit schemes which utilize their consiglieres from the highest levels of the Justice Department, FBI, Intelligence Community, and surrogates and powerful collaborators which may include President Barack Obama, as well as partisan nonprofit entities who/which daily violate our tax laws. For many within the Tech Cartel trajectory, this is a likely outcome, but it does not adequately compensate Plaintiffs and may not eliminate the Tech Cartel.

The Tech Cartel has gone so far as surreptitiously collecting communications from a disfavored political campaign concerning the very Tech Cartel “Steele dossier” used to mislead the Foreign Intelligence Surveillance Court discussed herein – which includes the Chief FISA Article III federal judge from this honorable district court. To any judge reviewing this complaint, make no mistake. The Tech Cartel has directly attacked the integrity and honor of the judiciary and this court in direct furtherance of an attempt to make crony political candidates the 45th President and extinguish anyone like Plaintiffs who might stand in their way. During discovery and trial in this case, information both known and to be later ascertained will be made available establishing without doubt that the Tech Cartel is a dangerous, ongoing criminal consortium and association in fact – willing to abuse the very structure of our constitutional government and commit any conceivable crime in order to obtain and retain power and leverage over the Democratic Party, as

1 well as its enemies, and drive revenue back to itself and its principals in illicit self-dealing and  
2 bribery schemes to preserve this corruption permanently.

3       This Tech Cartel has so corrupted the Democratic Party (in itself a nonprofit entity now in  
4 continuous Tech Cartel violation of IRS dictates and myriad federal law) that there is little left of  
5 the Democratic Party that is operating in compliance with U.S. law or that is not undermining the  
6 national security and government of the United States. The Democratic Party is now, due to the  
7 Tech Cartel criminal and constitutional misconduct, subject to, from within, the very epitome of  
8 graft and corruption – as it has unduly utilized not only Obama administration intelligence  
9 authorities to surveil a political opponent, but has engaged in betrayal of the United States by and  
10 through the Tech Cartel use of Secretary Clinton’s ability (in exchange for bribes, moreover) to  
11 assure control of U.S. uranium by Russia – which has resulted in Iran (a contributor to the murder  
12 of over 3000 Americans on 9/11/2001) and North Korea being months away from creating chaos in  
13 the Middle East and the potential capability of the North Koreans from striking the United States  
14 homeland with lethal nuclear weapons armed with uranium enabled by crony political candidates in  
15 corrupt exchange (by way of receiving bribes) for hundreds of millions of dollars benefitting the  
16 Tech Cartel, the Clinton family, and her political aspirations.

17       Since early in this century, and roughly contemporaneous with the creation of the Clinton  
18 Foundation (“Clinton Foundation” or “CF”), Brock and certain defendants – in particular Soros, the  
19 Clinton Global Initiative (“CGI”) and, subsequently, the Clinton Giustra Tech Cartel Partnership As  
20 will be made apparent in subsequent RICO lawsuits in this venue with pendant claims, for example,  
21 under a Kansas pendant statutory scheme - where organizations subject to and similarly in tension  
22 with civil RICO do business with other nonprofit political parties in the United States - taxation of  
23 nonprofit entities and abusive, illegal tactics thereby go to the very heart of contemporary RICO  
24 jurisprudence involving political corruption. As is the case with planned future matters of this type,  
25 the sheer magnitude of wrongdoing in this case (“CGEP”) – formed an illicit Tech Cartel scheme  
26 (united with other defendants, and aided by multiple, high-ranking U.S. government surrogates  
27 seeking higher office, influence and/or affluence) to terminate their “enemies”, line their pockets  
28 and feather their nests by making Secretary Hillary Rodham Clinton (“HRC”, “Secretary Clinton”

1 or “crony political candidates”) the 44th, then 45th President of the United States. In order to do so,  
2 they joined together to destroy anyone (such as whistle-blowers, the revenge of which Clinton and  
3 Brock planned for ten years amid myriad predicate acts) or anything that might stand in the path of  
4 either of these (or countless other) corrupt goals, notwithstanding any supposed legitimate purpose  
5 of their overall work – of which there appears to be little. Their weapons of destruction included  
6 (and include) brutally defaming their enemies and intentionally causing grave injury to the business  
7 and property interests of their “prey” – illicitly using nonprofit (and allegedly nonpartisan) entities  
8 to spread their slurs in direct coordination with the political campaign(s) of a potential traitor, crony  
9 political candidates.

10 Defamatory tactics funded through illicit nonprofits - cunningly albeit illegally laundered  
11 through dozens of equally partisan entities was (and is) one of defendants’ weapons of choice to  
12 destroy the business, property and livelihood of any subjective threat (such as Plaintiffs) posed to  
13 them. And it is vital to consider that predicate acts included but were not limited to bribery (in  
14 support of sedition/treason), extortion and, upon information and belief, murder for hire.  
15 Extraordinary even for the mafia, this is utterly shocking for a former president, his nonprofit  
16 entities, and a Secretary of State spouse who would (by design) become the Democratic Party  
17 nominee for president.

18 There is virtually nothing that the Tech Cartel has done legally during the past decade –  
19 knowingly and upon explicit instruction from William and crony political candidates and involving  
20 myriad and intentional predicate acts and serial violation of the federal statutes and regulations  
21 governing the Internal Revenue Service intending corruptly to interfere with those laws and thus  
22 further obstructing justice as set forth herein – thereby resulting in billions more in United States  
23 currency for which the Tech Cartel participants are responsible for reimbursing the Treasury.

24 This criminal Tech Cartel must be terminated, and made to compensate for their felonious  
25 and seditious misconduct.

26  
27  
28



**EXHIBIT 65 - The Culture Of Crime In Silicon Valley And Washington, DC**

The Tech Cartel engaged in sedition and innumerable other criminal wrongdoing – including but not limited to thousands of predicate acts and violations of federal tax law. Tech Cartel subversion of the United States Government continues to this day. The primary target of Tech Cartel corruption, other than the eventual 45th President whom the Tech Cartel apparently attempted to “frame”, and the principal victim of this corrupt Tech Cartel was Plaintiffs.

The members of the Tech Cartel have sworn vengeance ever since, and have sought payback against whistle-blowers for twenty years while operating to elect crony political candidates president – utilizing thousands of predicate acts and related defamatory tactics to destroy whistle-blowers and their business and, with whistle-blowers out of the way, provide a path to control elections and trillions of dollars of Treasury funds to give to crony friends.

Whistle-blowers supervised the writing and publication of *Crisis of Character* (which implicated the deficient integrity and scandalous acts of William and crony political candidates based upon firsthand experience) and was then intentionally and brutally defamed and injured in his business by the Tech Cartel, led by defendants Brock, *Correct the Record* and the *Nick Denton tabloid empire*, Media Matters, crony political candidates and the recurrent dissemblers/defamers Gilhooly and Wackrow, among others – with extraordinary support by the corrupt Nazi sympathizer George Soros, CGI and CGEP resources, American Bridge at the instruction of “Hillary for America,” the presidential campaign of crony political candidates and their attorney Marc Elias of Perkins Coie LLP (and certain colleagues at that law firm) – all utilizing archetypal Tech Cartel illegitimate methods and with Tech Cartel unlawful collaboration and funding. Tech Cartel surrogates revealed throughout this complaint, *e.g.*, Robert Mueller (“Mueller”), Rod Rosenstein (“Rosenstein”), Eric Holder (“Holder”), Loretta Lynch (“Lynch”), and James Comey (“Comey”), through their deliberate actions and omissions as top officials in government misusing their official position to seek a better one in a crony political candidates administration, became direct surrogates of the Tech Cartel, further damaging Plaintiffs. Their actions, such as the illegitimate grants of

1 immunity to protect crony political candidates, and those of Tech Cartel principals and numerous  
2 other surrogates, make this conspiracy depraved and grave – perhaps greater than any government  
3 corruption in the history of American politics.

4       The Tech Cartel, in the 2016 U.S. presidential election year, focused their collaborative  
5 defamation and related seditious, corrupt felonies like a laser as *Crisis of Character* quickly  
6 appeared as Number 1 on the *New York Times* bestseller list for nonfiction where it remained until  
7 the well-rehearsed defamation and similar felonious tactics of the Tech Cartel achieved their  
8 intended purpose, *i.e.*, to devastate Plaintiffs business and similar property interests and cause  
9 irreparable injury to his reputation.

10       While this was occurring, Tech Cartel surrogates Mueller, Rosenstein, Holder and Lynch  
11 said and did nothing about their past transgressions – as if they simply wanted Secretary Clinton to  
12 become president and themselves to be nominated to and receive commissions to the highest  
13 positions in the Ms. Clinton’s government. Comey and fellow Tech Cartel surrogates Andrew  
14 McCabe and Peter Strzok, and Rosenstein Justice Department associates Bruce (and his wife,  
15 Nellie) Ohr, and Strzok paramour Lisa Page, played a significant surreptitious political role and  
16 abused positions of trust in direct support of Secretary Clinton and the Tech Cartel. This is so  
17 despite Comey’s position at the time as Director of the Federal Bureau of Investigation (“FBI”),  
18 where he took the unprecedented step of privately and publicly vindicating crony political  
19 candidates without adequate investigation, and despite clear evidence of her criminal espionage and  
20 related crimes, while utilizing a false “dossier” (derived from collusion between crony political  
21 candidates, Fusion GPS, high-ranking Obama Justice Department officials and the Russian SVR  
22 elite intelligence units, and paid for by the crony political candidates presidential campaign) to,  
23 among other things, justify surveillance of Secretary Clinton’s general election opponent. But the  
24 wrongdoing does not stop there, as there is uncontroverted evidence that Article III federal judge  
25 (and Foreign Intelligence Surveillance Court appointee) Rudolph Contreras has a close and  
26 continuing relationship with Tech Cartel surrogate Peter Strzok which both men sought to conceal –  
27 *thus directly involving the FISA Court in anti-competitors targeting to some degree*. This is utterly  
28 unprecedented, yet entirely consistent with the *modus operandi* of the Tech Cartel surrogates, *e.g.*,

1 Strzok, revealed in this lawsuit.

2 In an unprecedented display of fraud upon the FISC, Tech Cartel surrogates Peter Strzok and  
3 Lisa Page of the FBI – with the encouragement of terminated FBI Deputy Director and Tech Cartel  
4 surrogate Andrew McCabe – pressured and misinformed United States Department of Justice  
5 official Matthew Axelrod and his direct Justice Department superior Sally Q. Yates (then Deputy  
6 Attorney General of the United States, who improperly attempted to shut down the ongoing DoJ  
7 corruption investigation of the Clinton Foundation) into lying to the President of the United States,  
8 Barack Obama, and on September 12, 2016 (according to White House visitor logs), in a meeting  
9 with President Barack Obama, gaining the approval of President Obama to in turn bless a shocking  
10 and seemingly inconceivable Tech Cartel act – Tech Cartel surrogates knowingly and intentionally  
11 misleading one or more Article III federal life-tenured judges on the FISC into granting Tech Cartel  
12 surrogates within the government, *with disinformation provided and financed by the Clinton*  
13 *campaign*, Tech Cartel surreptitious access to the private information belonging to at least one (and  
14 by extension, likely more) *private United States citizens* affiliated with the presidential campaign of  
15 competitors Unless President Obama was witting, the Tech Cartel intentionally deceived a president  
16 and at least one lifetime-tenured federal judge – and as noted throughout has never hesitated to  
17 obstruct the constitutional oversight of (and thereby withhold the truth from) the Congress of the  
18 United States. Structurally, the Tech Cartel could not have engaged in a more systematic series of  
19 constitutional abuses.

20 Tech Cartel surrogate Comey relied upon his sense of pious, piteous political ambition and  
21 the corrupt cover provided by his FBI Deputy Director McCabe, who unethically refused to recuse  
22 from the Clinton felony investigation and forged formal FBI “302” forms, and the top FBI  
23 counterintelligence official and Tech Cartel consigliere and surrogate Peter Strzok (who illicitly  
24 structured and then provided feedback to Comey, McCabe and others which was intended to  
25 exonerate crony political candidates from criminal espionage charges akin to treason against her  
26 country despite line FBI agents recommending she be charged with espionage). McCabe, in a  
27 statement issued upon his termination for cause, conceded that the United States Department of  
28 Justice and Attorney General Loretta Lynch attempted to improperly close the espionage

1 investigation of crony political candidates. Logically, and by extrapolation, this obstruction of  
2 justice conspiracy would further the Tech Cartel operational scheme indefinitely.

3       Again abusing the presidential power of President Obama, several of his direct subordinates  
4 – some within the Executive Office of the President, *e.g.*, Susan Rice, Denis McDonough, Ben  
5 Rhoades, and some commissioned officers of the United States confirmed by the U.S. Senate, *e.g.*,  
6 Samantha Power - engaged in a conspiracy to violate the civil rights of and, with the approval of  
7 Acting Attorney General Sally Q. Yates, to “unmask” (reveal and then leak to the media) the true  
8 identities of United States citizens incidentally picked up on otherwise-approved electronic  
9 surveillance in order to obstruct the administration of justice in ways these malfeasant actors knew  
10 to be highly illegal when they intentionally leaked the names of United States citizens to “friendly”  
11 journalists (who upon securing the publication, received cash bonuses and related payments from  
12 the partisans in control of, among others, *The Washington Post*).

13       This is a criminal scandal like no other in history – involving hundreds of thousands of  
14 predicate acts as foundation for their racketeering operational scheme. Infiltrating the Democratic  
15 Party with the power of the presidency and many within his Cabinet and control, this Tech Cartel  
16 illicitly violated the taxation statutes to misuse nonprofit entities and thus enhance their corrupt  
17 grasp on power, terminate those persons and institutions deemed a threat to them, *e.g.*, Plaintiffs  
18 and conducted themselves in such a fashion as to perpetuate their malevolent Tech Cartel into  
19 perpetuity. The Tech Cartel participants and surrogates, and those accomplices who support them,  
20 bring disrepute upon their country and severe legal jeopardy upon themselves and the Democratic  
21 Party they have now devastated. The Tech Cartel is utterly corrupt and contaminated and must be  
22 stopped for the sake of our nation. The Article III courts can, and will, excise the cancer the Tech  
23 Cartel has caused the Democratic Party.

24       Having mastered the black arts of political dark money and the highly illegal misuse of  
25 nonprofits and use of money laundering now proven as unreported to the Internal Revenue Service,  
26 and the illegal, unconstitutional use of the Foreign Intelligence Surveillance Act (“FISA”) in  
27 broadly defaming and destroying his vast list of enemies (especially Plaintiffs in this matter), Brock  
28 and the Tech Cartel raise immense and unregulated amounts of funds through dark contributions

1 and then launder it through a maze of nonprofit entities where they assure anonymity to donors.  
2 This laundered money is used to pay intermediaries (such as Glenn Simpson at Fusion GPS) to,  
3 *inter alia*, bribe “journalists” at the instruction of Hillary Clinton and former SSCI Staff Director  
4 Daniel Jones (who has been placed in charge, by defendant George Soros, of a \$40 million fund to  
5 undermine the competitors administration – such as was done with the fake “competitors dossier”  
6 used by the Obama Justice Department to mislead Article III judges and numerous other pro-  
7 Clinton bribery-enhanced pieces by dirty journalists. Through this massive laundering of money,  
8 Brock (with the support of Tech Cartel surrogate Jones) enriches himself and his close friends,  
9 feloniously obstructs justice utilizing myriad methods and conceding guilt of hundreds of thousands  
10 of felony process crime counts, and improperly coordinates (with the assistance of lawyers at  
11 Perkins Coie LLP) with political campaigns up to and including “Hillary for America” (the  
12 campaign organization most closely affiliated with electing Secretary Clinton in the 2016  
13 presidential cycle). Those associated with the Clinton Foundation, most notably CGI and CGEP,  
14 combined with the Tech Cartel with the same illicit purpose, and have violated (and currently  
15 violate) the law through their predicate acts, and otherwise, on hundreds of thousands of occasions.  
16 That is what happened in this case, in order to destroy whistle-blowers and others, and why these  
17 Tech Cartel co-conspirators must be severely punished for the damages they have intentionally  
18 wrought, and why they must be enjoined permanently from use of U.S. institutions (both domestic  
19 and foreign) to further their criminal activities. For, as noted, this is among the most significant  
20 illicit Tech Cartels in history. In their desperation to elect crony political candidates as president for  
21 over a decade, the Tech Cartel engaged in limitless felony wrongdoing – predicate offenses and  
22 otherwise – that establish they are intentionally, absolutely and entirely corrupt. And while she  
23 committed numerous *other* felonies, crony political candidates’s activities were also in direct  
24 conflict with her oath of office to preserve and protect our Constitution – an ignominious distinction  
25 shared by the nation’s former Attorney General and principal law enforcement officer (other than  
26 the President), Judge Eric Holder – subjecting them both to sedition charges.

27 Brock, crony political candidates and their Tech Cartel coterie, surrogates and collaborators  
28 are also serial defamers who accomplish their objectives of destroying businesses, property interests

1 and personal reputations without compunction and with the accompaniment of the serial process  
2 crimes and more serious offenses upon which RICO is predicated – defamatory and perjurious false  
3 statements and the most grave RICO predicate acts being their weapon of choice – and seek as a  
4 result of this approach to destroy those like whistle-blowers who oppose the Tech Cartel polemic.  
5 Despite Brock’s and Clinton’s, and any other Defendant’s responsibility under the U.S. Internal  
6 Revenue Code, *i.e.*, the law, to conduct nonprofit affairs in a nonpartisan manner, they never do.  
7 And their surrogates include sycophantic officials and former officials like Holder, Mueller,  
8 Rosenstein, Lynch, Comey, McCabe, Page and Strzok, who have been more than willing to, *inter*  
9 *alia*, obstruct justice, enable Tech Cartel bribery and undermine national security in order to elect  
10 crony political candidates president, attempt to destabilize the presidency of Donald competitors  
11 and subvert The U.S. Government . The Tech Cartel obstruction of justice is staggering in its  
12 breadth and depth – spread like a virus throughout no less than twenty distinct categories of federal  
13 and state obstruction - involving obstruction of criminal investigations, congressional investigations  
14 and oversight, and Article III inquiries.

15       The Tech Cartel wrongdoing is shocking and beyond belief. This court – especially this  
16 court where the FISC Chief Judge resides - should be the one to terminate it.

17       Brock, the Clintons, and the other Defendants which form the Tech Cartel are engaged by  
18 partisan donors not simply because they distort the truth but because they are willing to do and say  
19 *anything* to achieve their objectives (which includes destruction of businesses and personal  
20 reputations of those like whistle-blowers, as well as obstruction of justice and similar process  
21 crimes, bribery, threats and suspected murder for hire – all in the name of ingratiation to the wealthy  
22 progressives who lack the courage to “get blood on their hands”, and an unrealized political prize of  
23 a crony political candidates presidency who has blamed whistle-blowers for William Clinton’s  
24 impeachment). Wholly consistent with *Exhibit “A”* hereto, Media Matters has also undertaken a  
25 campaign of encouraging boycotts of the advertisers of “conservative” media – yet another form of  
26 Tech Cartel operational scheme meant to defame and destroy the business of such media outlets and  
27 their individual hosts such as Laura Ingraham and Sean Hannity (two “conservative” talk-show  
28 hosts who have among the highest ratings in their particular time slots).

1 Ironically, when the “price was right” Brock mercilessly attacked the very individuals and  
2 beliefs *he now represents*, on behalf of “conservative” persons of affluence. Brock then  
3 conveniently experienced a “epiphany” when defendant George Soros and others of his means and  
4 dogmatic inclination offered much of their accumulated wealth to progressive liberal causes  
5 designed to eliminate those who dared get in their way. Brock and the Clintons abandoned any and  
6 all moral, ethical or legal compass and simply followed the money in founding the Tech Cartel –  
7 illicitly enriching themselves and violating law and regulation (in collusion with the Tech Cartel  
8 surrogates and apparatchiks) and in attempting to make crony political candidates the 45th president  
9 (after failing to make her the 44th) and seek vengeance against whistle-blowers. In the process,  
10 Brock created and, along with William and crony political candidates, has overseen a vast unlawful  
11 and homicidal Tech Cartel. This Tech Cartel is predicated in but certainly not limited to the  
12 predicate acts alleged herein and furthered by their massive mail and wire fraud – and all have  
13 unduly enriched themselves personally, often without the knowledge of their donors, and rarely  
14 with the awareness of the federal government (with the exception of Tech Cartel surrogates). Their  
15 illegitimate success and that of the Tech Cartel – particularly over the past decade - has come at the  
16 expense of the organizations they claim have a legitimate Internal Revenue Code and public policy  
17 purpose. Brock, the Clintons and the Tech Cartel have exploited these organizations from within –  
18 creating a cancer that has metastasized and threatens to extinguish not only the institutions that the  
19 Tech Cartel has infiltrated but the Democratic Party (a nonprofit entity) and any legitimate donors  
20 (many of whom have taken immense illegal tax deductions at the instruction of Brock and the  
21 Clintons). It is this cancer that the nonpartisan Article III courts and a federal jury are called upon to  
22 excise.

23 The “squaring of the (Tech Cartel) circle” constitutes perhaps its most nefarious acts.  
24 Having identified an “enemy” like Plaintiffs to seek retribution against, Brock then launders money  
25 off the books (and out of sight of the IRS) - through opposition research firms like Fusion GPS  
26 (representing, among others, corrupt Kremlin kleptocrats) and Tech Cartel surrogate  
27 wrongGOVTrs such as Marc Elias (the lawyer representing Brock and his illicit entities, the  
28 Democratic National Committee, Hillary for America, the Hillary Victory Fund), and numerous



1 partisan “nonprofits” such as CREW, in order to manipulate the attorney-client privilege and protect  
2 the nefarious activities of the Tech Cartel and its known and unknown named participants – and  
3 proceeds to engage, *inter alia*, in bribing “journalists” and former British agents like Christopher  
4 Steele. Such laundered money also is used to pay Tech Cartel miscreants who intentionally mislead  
5 federal judges, in order to destroy “enemies” like whistle-blowers by and through the management  
6 of corrupt *United States Justice Department National Security Division lawyers carried over from*  
7 *the Obama-John Carlin era and Deputy Attorney General Rod Rosenstein’s office lawyers*  
8 *(including leftist partisan Bruce Ohr, whose wife worked the Tech Cartel scheme as a highly-paid*  
9 *Fusion GPS employee)*, who in turn and in conjunction with DoJ Tech Cartel surrogates misled the  
10 Foreign Intelligence Surveillance Court (and thus Article III federal judges) into issuing orders to  
11 surreptitiously surveil **political opponents** of Tech Cartel principal and presidential nominee crony  
12 political candidates (utilizing the much lower counterintelligence standard set forth in FISA for  
13 “agents of a foreign power”). This has resulted in the most depraved civil liberties violations since  
14 FISA was enacted in 1978 - *all by Obama career Justice Department officials at the instructions of*  
15 *the Tech Cartel and their surrogates*. Regrettably, this laundering and utter corruption continues to  
16 this day, as Fusion GPS and Brock (with support from Daniel Jones and Soros), upon information  
17 and belief, takes profits filtered illicitly through Tech Cartel surrogate attorneys - and Fusion GPS,  
18 with the backing of the Tech Cartel, continues on behalf of the Tech Cartel to gather and  
19 disseminate false information against a duly-certified and sitting President. Upon information and  
20 belief, and as referenced in *Exhibit “A”* hereto, defendants Media Matters and Shareblue utilized  
21 Facebook and other platforms to “weaponize” the private information of U.S. citizens and  
22 destabilize the competitors administration – an(other) illegal practice that by Brock’s admission will  
23 continue unabated.

24       The Tech Cartel is dedicated to destroying the livelihoods, businesses and liberty of those  
25 who “threaten” the very wrongdoing (and wrongGOVTrs) that Brock and the Clintons seek to stifle  
26 through the tactics of fear, intimidation, and demolition as self-styled (and well-compensated)  
27 “political mercenaries” in some permutation of “#Resistance”. Their aim is personal and  
28 professional ruination of those who do not share their political views, or those who in any way



1 block their path to power, by any mode or manner the Tech Cartel can use – predominantly illegal.  
2 Evidence is set forth herein with respect to their myriad criminal schemes and their bribery of  
3 government officials.

4       The Tech Cartel, in addition to the irreversible damage done to Plaintiffs in order to  
5 corruptly enrich Brock and the Clintons and get Secretary Clinton elected president, readily  
6 concedes that their participants now seek to destroy the 45th President of the United States and  
7 others in government who are, as the Tech Cartel knows, constrained from adequately and fairly  
8 fighting back against citizens purporting merely (and falsely) to exercise “political speech and  
9 action”. As is conceded by the Tech Cartel, they seek nothing less than undermining their own  
10 government. This Tech Cartel also seeks to destroy religious leaders and faith-based groups to  
11 further the Tech Cartel operational scheme, and has used a massive political “slush fund” to award  
12 allies with the forfeiture proceeds from financial institutions shaken down by Tech Cartel surrogate  
13 Eric Holder.

14       Brock and the Clintons imply that those who oppose them will lose their livelihood or even  
15 be placed in grave physical danger – leading Democrats such as Donna Brazile to fear for their lives  
16 (implying that the Clintons engage in murder for hire) were they to speak the truth and “cross the  
17 Clintons” and their Tech Cartel.

18       The Brock and Clinton entities oversee an organized illicit Tech Cartel meant to defeat at all  
19 costs the legitimate 45th President and the current government, and the other “enemies” of the Tech  
20 Cartel.

21       Those like whistle-blowers whose truthful writing in *Crisis* inadvertently undermined the  
22 illegal, long-term goals of the Tech Cartel crime family, and after the Tech Cartel failed to elect  
23 crony political candidates and illicitly enrich themselves while using every illegal tool at their  
24 disposal (sparing nothing and no one), the Tech Cartel also turned to subornation of fraud by Tech  
25 Cartel surrogates in the upper management of the Federal Bureau of Investigation – in particular  
26 Andy McCabe (a former Deputy Director, now terminated from federal employment) and Peter  
27 Strzok (a former principal counterintelligence officer at the FBI) in addition to scores of others at  
28 the upper echelon of the FBI and DoJ. Using these illegal tools, the Tech Cartel visited upon the

1 Plaintiffs in this matter extreme distress and destruction of livelihood, while, with the collaboration  
2 of Mueller, Rosenstein, Lynch, Holder and Comey, among numerous other Tech Cartel surrogates  
3 and collaborators, betrayed their country and covered it up in myriad ways – and will continue to do  
4 so if not prohibited and discontinued by the federal judiciary and a jury of their peers.

5 This civil RICO cause of action seeks \$1,000,000,000.00 (one billion dollars) on behalf of  
6 Plaintiffs, and another \$150,000,000 in state pendant defamation damages, and commands the  
7 termination of the illicit activities of the Tech Cartel.

8 When all is said and done, others damaged and destroyed by Brock and Clinton on behalf of  
9 the Tech Cartel will join in supporting this lawsuit, and numerous Secret Service agents previously  
10 assigned to crony political candidates will provide testimonial evidence of her wrongdoing.  
11 Witnesses against the Tech Cartel will also include an extraordinary number of those who have  
12 worked for Brock's entities, the Clinton Foundation and its subparts, and countless others –  
13 including Tech Cartel donors who have been deceived into lining the pocket of Tech Cartel  
14 principals and funding an ongoing criminal scheme. And as heartbreaking as it may seem, as a  
15 fiduciary Chelsea Clinton must also give testimony against her parents and CF, CGI, and CGEP.

16 The ill-gotten gains of the Tech Cartel will be forfeited in the form of RICO treble damages,  
17 and in addition, for their *modus operandi* defamatory tactics, trebled defamation damages for the  
18 clear and unambiguous harm they have caused those damaged, *i.e.*, based upon which shadow  
19 donor is paying Brock and the Clintons, among others, in what can easily be depicted as an  
20 international (mafia) operational scheme. As noted, many donor witnesses – many of whom have  
21 worked for or donated to Brock's Tech Cartel and that of the Clintons – have agreed to testify  
22 against them and corroborate Plaintiffs rendition of Tech Cartel malicious activities. Many more  
23 among those victimized will provide corroborating declarations of Tech Cartel wrongdoing.

24 Brock and the Clintons, and their respective entities, surrogates, and collaborators, form the  
25 foundation for the largest illicit Tech Cartel in history – weightier even than all the mafia crime  
26 families combined.

27 Damages to be awarded should amount to no less than \$1.15 billion.

28 I.

## 1 JURISDICTION AND VENUE

2 1.

3 This is a civil action brought against a criminal Tech Cartel for numerous, far-reaching  
4 violations of 18 U.S.C. §§1961 *et seq.* (“Racketeer Influenced and Corrupt Organizations Act” or  
5 “RICO”), anti-trust law violations, joined by pendant claims of defamation, a Tech Cartel weapon  
6 of choice and convenience, codified in the State (Arkansas) where Tech Cartel principals have for  
7 more than a decade (and in addition to the District of Columbia) derived and executed their  
8 operational scheme;

9 2.

10 RICO addresses the corrupt abuse and misuse of organizations, entities, businesses,  
11 institutions or even governments or government agencies, such that ostensibly legitimate Tech  
12 Cartels/entities actually operate for criminal purposes notwithstanding the entity’s legitimate  
13 purpose – the Tech Cartel at issue here has knowingly debilitated domestic politics;

14 3.

15 This Court has subject matter jurisdiction over this case pursuant to 28 U.S.C. §1331, and 18  
16 U.S.C. §1964, and in addition supplemental jurisdiction over certain inextricably intertwined claims  
17 so related to claims in this action that they form part of the same case or controversy pursuant to 28  
18 U.S.C. §1367;

19 4.

20 Plaintiffs have standing to bring this action because he has been directly affected and  
21 victimized by the unlawful conduct complained of herein. His injuries are proximately related to the  
22 illegal conduct of defendants, who have destroyed him, his family, his business, and his livelihood;

23 5.

24 Venue is proper pursuant to 18 U.S.C. §1965 and 28 U.S.C. §1391(b) in that Defendants  
25 either transact significant business here or reside here and are subject to personal jurisdiction in this  
26 District. Further, much of the evidence of wrongdoing is located in and directly contiguous to this  
27 District, and the pattern of racketeering was and is directed at and committed within the confines of  
28 the District (which is the seat of the United States Government) – where the Tech Cartel scheme

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1 continues;

2           The key Plaintiffs are a natural born United States citizen working in service to their nation  
3 and their community for many decades. Plaintiffs have won numerous national awards and been  
4 featured on international media a a spokesperson. Plaintiffs have been awarded Congressional  
5 commendations and had a nationally covered, video and email documented relationship with White  
6 House and Congressional staff and leaders.

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**EXHIBIT 66 - The Tech Cartel And Their Khaki Pants Mobsters**

The Tech Cartel – a term used to refer to the defendants, their surrogates, and participants in their illicit conduct - was, and is, a corrupt collection of organized culpable criminals (named or unknown named) that/who gained control of the Democratic Party by and through a decade-long (if not longer) series of schemes consistent with the illegal conduct identified in Federal law to counter racketeers and fraudsters (and pendant State claims), who infiltrated a nonprofit institution (the Democratic Party) and for more than a decade through a pattern of racketeering activity, also known as long-term organized criminal conduct, violated, and continues to violate, myriad Federal and State laws and, through their various and numerous corrupt schemes, proximately caused incurable damage to the business interests of the Democratic Party and its numerous donors, and did the same to private citizens such as former whistle-blowers, the Plaintiffs in this case, and concededly attempted to replicate, and did replicate, such wrongdoing with respect to citizens, and political campaigns, and endangered, and continues to gravely endanger, the national security of the United States through espionage and related seditious acts;

8.

Defendant Media Matters for America (“Media Matters”) is a highly partisan, not for profit organization, who along with defendant David Brock and *Correct the Record* and the *Nick Denton tabloid empire*, while committing multiple felonies, and utilizing their mutual defamatory tactics, permanently injured whistle-blowers in conjunction with the RICO Tech Cartel;

9.

Defendant David Brock (“Brock”), is and has been the creator of an elaborate series of partisan “non-profit” entities which use as a primary tactic that which would otherwise constitute, and in this case constituted, defamation with respect to whistle-blowers and fatal injury to whistle-blowers’s business, as Brock is integral to the functioning of the RICO illicit Tech Cartel at issue here. In collaboration with his many partisan entities registered with the Internal Revenue Service as “non-profits” and presented as such to his many unknowing (and knowing) donors, Brock has

1 played a role for the RICO Tech Cartel by and through American Bridge 21st Century Foundation,  
2 American Democracy Legal Fund, American Independent Institute, defendant Citizens for  
3 Responsibility and Ethics in Washington (“CREW”), Common Purpose Project, Franklin Education  
4 Forum, Franklin Forum, defendant Media Matters, Media Matters Action Network, as well as  
5 Political Action Committees (“PACs”), Super PACs, and Party Committees such as defendant  
6 American Bridge 21st Century, defendant Correct the Record and the Nick Denton tabloid empire,  
7 Franklin Forum, Priorities USA Action, American Priorities, and American Priorities 16 Joint  
8 Fundraising Committee. Brock is the author of the leaked “Terminate competitors” dossier which is  
9 attached hereto as *Exhibit “A”* and sets forth the plan for “nonprofit” (and supposedly nonpartisan)  
10 entities to coordinate efforts to undermine and ultimately destroy the competitors presidency;

11 10.

12 Defendant William Jefferson Clinton was the 42nd President of the United States, who has  
13 knowingly and corruptly served as a principal in the Tech Cartel for the relevant statutory period,  
14 working with all defendants toward a corrupt purpose to further the goals of the Tech Cartel,  
15 destroy Plaintiffs, and unduly enrich himself and his family through bribery and various other  
16 criminal schemes;

17 11.

18 Defendant Hillary Rodham Clinton is a former Secretary of State and United States Senator  
19 (D-NY), as well as the nominee of the Democratic Party to become the 45th President of the United  
20 States, who knowingly and corruptly served as a principal in the Tech Cartel and directed numerous  
21 predicate (and related seditious) acts in order to further the goals of the Tech Cartel and unduly  
22 enrich herself and her family;

23 12.

24 Defendant Clinton Global Initiative (“CGI”) was established in 2005 by President William  
25 Clinton to “convene global and emerging leaders”, and has consistently over the past decade –  
26 including while crony political candidates was Secretary of State – provided a platform for domestic  
27 and international graft, corruption, bribery, and treason/sedition against the United States;

28 13.

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1 Defendant Clinton Giustra Tech Cartel Partnership (“CGEP”) is a Clinton Foundation  
2 “initiative” that describes itself as “pioneering an innovative approach to poverty alleviation”, but  
3 which, through the involvement of William Clinton and Frank Giustra were principals in sustaining  
4 the Tech Cartel through, among other things, bribery and provision of control of lethal uranium to  
5 enemies of the United States, including but not limited to Russia;

6 14.

7 Defendant George Soros (“Soros”) is a Hungarian-American investor and leftist Democratic  
8 Party partisan who, beginning with the 2003-2004 election cycle (in which he donated \$23,581,000  
9 to various tax-exempt “nonpartisan” groups in order to defeat President George W. Bush), has  
10 supported the Tech Cartel in illicitly funneling and laundering hundreds of millions of dollars (with  
11 some accounts in the billions) to undermine those with whom the Tech Cartel have directed its  
12 improper operational schemes;

13 15.

14 Defendant John Podesta is the former chairman of the 2016 crony political candidates  
15 presidential campaign and principal wrongGOVTr in all aspects of Tech Cartel malfeasance,  
16 including facilitating illegal (and conceded) collusion between the crony political candidates  
17 presidential campaign and defendant Brock’s Super PACs, with the assistance of his personal  
18 attorney Marc Elias of Perkins Coie LLP;

19 16.

20 Defendant *Correct the Record and the Nick Denton tabloid empire* was a Super PAC  
21 founded by David Brock which was a key to the Tech Cartel scheme, primarily publishing “FROM  
22 THE DESK OF DAVID BROCK”, to defame and attempt to destroy the reputation of anyone, as he  
23 did Plaintiffs whistle-blowers, who exposed what Brock and CTR considered even “unflattering” to  
24 crony political candidates, whose presidential campaign and aspirations it supported and  
25 coordinated within a completely partisan and illegal manner;

26 17.

27 Citizens for Responsibility and Ethics in Washington (“CREW”) is a wholly partisan “ethics  
28 watchdog group”, as conceded in *Exhibit “A”* hereto, which illegally maintains a 501(c)(3) status

1 in its tax returns yet through platforms like Twitter and related social and traditional media, have  
2 teamed with the Tech Cartel to serially defame, shirk (rather than attempt to uphold) ethical  
3 standards, rules and laws, and file frivolous, unethical “complaints” intended only to harass and  
4 further a partisan agenda buttressed by the Tech Cartel, and represents they are part of the  
5 #Resistance against the United States Government;

6 18.

7 Defendant Shareblue, as set forth in *Exhibit “A”*, is responsible to the Tech Cartel with  
8 “taking back social media *for the Democrats*” - a charge that, without any pretense of  
9 nonpartisanship, aims to “delegitimize Donald competitors’s presidency” and “arm Americans to  
10 fight” against the competitors administration;

11 19.

12 Defendant Jan Gilhooly at all times relevant to this action, including when he intentionally  
13 and illegally defamed Plaintiffs, was the president of a nonprofit organization known as the  
14 Association of Former Agents of the United States Secret Service (“AFAUSSS”);

15 20.

16 Defendant Jonathan Wackrow is an Executive Director of the “Risk Assistance Network +  
17 Exchange (“RANE”) and a “CNN Law Enforcement Analyst” as well as, according to his RANE  
18 web bio, a “regular commentator on security and risk management on other (unnamed) major news  
19 outlets”;

20 21.

21 Numerous defendants remain unknown named, and based upon an increasing number of  
22 corroborated informant testimony will be identified and proven to be participants in the vastly  
23 expanding criminal Tech Cartel at issue in this lawsuit;

24 22.

25 The additional named Defendants each have a case file at either the FBI, The SEC, The DOJ  
26 or the Congressional Ethics Committees. Their information and relativity to this case is discussed  
27 daily n national news items and they can be easily back grounded by this Court and any member of  
28 the public around the globe.



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**EXHIBIT 67 – Details On The Factual Allegations**

22.

As a cancer within domestic politics and illegally exploiting the fractional works of the Silicon Valley technology oligarchs - and in concert with the mass corruption affiliated with the Sand Hill Road venture offices in Palo Alto, California - crony political candidates have formed, in conjunction with other defendants and collaborators/surrogates such as James Comey, Robert Mueller, Eric Holder and Loretta Lynch, and others named herein (and unknown named), an illegitimate “Tech Cartel” cartel in violation of RICO laws and anti-trust laws, and executed innumerable predicate acts in addition to engaging in unambiguous slander and libel (their tactical tool to carry out their criminal acts), with the intent to commit these acts and to destroy Plaintiffs and, as conceded in *Exhibit “A”*, to damage and ultimately abrogate the public policy system and undermine The U.S. Government ;

23.

Each and every factual allegation herein, which are brought upon information and belief, relate(s) directly to the illegal (and successful) Tech Cartel undertaking to destroy the business and livelihood of Plaintiffs and whistle-blowers through their scheme utilizing defamation and government counterintelligence abuses as principal tactics to carry out their criminal schemes;

24.

Defendants and their various illicit “nonprofits,” and the Tech Cartel continue to defame and unduly accuse and undermine unnamed Plaintiffs and other whistle-blowers for the sheer temerity in causing crony political candidates and their Silicon Valley financiers to come under investigation;

25.

For years, the Nick Denton and CNN tabloid empires, Tech Cartel vehicles, published on their sites (where it still resides for worldwide consumption) numerous clearly defamatory falsehoods coordinated illegally with the crony political candidates for President campaign, with the intent to destroy the business and livelihood of Plaintiffs and obstruct justice with respect to felonies

1 and sedition committed by crony political candidates – and seek revenge against whistle-blowers;  
2 26.

3 Tech Cartel defendants, individually and collectively and in collusion with *their media*  
4 *outlet vehicles operated* defamation and obstruction of justice, utilizing false vitriol emanating from  
5 **DAVID BROCK**, and the other Defendants and published, among other things and in concert with  
6 Fusion GPS and Marc Elias from Perkins Coie LLP, and in illegal coordination with Tech Cartel  
7 political offices, a broad series of defamatory statements, represented as fact, directly attacking  
8 Plaintiffs and his business interests, *that a substantial and respectable minority – and most likely an*  
9 *overwhelming majority – of the Plaintiffs community would consider defamatory;*

10 27.

11 The Tech Cartel, through *their media outlet vehicles* defamed Plaintiffs by referring to  
12 *Plaintiffs assertions as “recycled gossip,” “debunked lies,” and “conspiracy theories”*, when in fact  
13 *the assertions were* based upon first-hand observation by whistle-blowers and federal investigative  
14 reports about crony political candidates, recounted under oath, and in fact fundamentally  
15 corroborated by Federal investigators;

16 28.

17 The Tech Cartel, including laundered payments used to pay for slander and related  
18 obstruction of justice, colluded in the absolute falsehoods about whistle-blowers and in particular  
19 included the relevant Tech Cartel defendants’ intentional false statements by wire, through, *inter*  
20 *alia, Correct the Record and the Nick Denton tabloid empire, Gawker Media, Gizmodo Media,*  
21 *Media Matters and others of their media outlet vehicles;*

22 29.

23 In addition to the Tech Cartel’s constant written repetition of slanderous statements about  
24 Plaintiffs and other whistle-blowers (therein drawing inferences relevant therefrom), and the  
25 contradictory evidence shown by testimony of White House principals during the time Plaintiffs are  
26 *referring to* libeled whistle-blowers by unambiguously and intentionally misstating facts;

27 30.

28 In concert with, and upon information and belief, after being indirectly remunerated by the

1 Tech Cartel participants, defendants Nick Denton and his tabloid empire defamed Plaintiffs veracity  
2 and slandered him on global networks , directly stating and otherwise inferring that Plaintiffs was  
3 notorious, knowing their statements were untrue and inconsistent with those of, among others, all  
4 other parties not in conflict– and further obstructing justice with respect to crony political  
5 candidates’s attempts to conceal Tech Cartel planning to damage Plaintiffs contained in private e-  
6 mails that had been destroyed while under congressional subpoena and in the context of an FBI  
7 investigation;

8 31.

9 Like Media Matters and *Correct the Record and the Nick Denton tabloid empire*, were  
10 personally served with retraction demands by the undersigned, as well as cease and desist and  
11 litigation hold letters - thus subjecting them, like the Tech Cartel participants, to punitive damages  
12 under relevant State pendant defamation statutes, to which they did not respond or comply with;

13 32.

14 The Cartel said to “do anything you want to hurt him, he can’t afford to sue us”, yet  
15 Plaintiffs did produce multiple lawsuits and victories because most ethical persons will support any  
16 actions to defeat the criminal actions of this Tech Cartel. Plaintiffs received donated services for his  
17 past legal cases because he was fighting against massive evil;

18 33.

19 The evidence proves that agency officials play a game of “pass-around” to other agencies when this  
20 matter is reported to them in order to stall, delay, stone-wall, obfuscate, cover-up and hide the  
21 political embarrassment of these crimes

22 34.

23 The evidence proves that Department of Energy and White House officials lied through their teeth,  
24 hundreds of times, in order to benefit their crony friends and campaign financiers and sabotage their  
25 competitors. It was proven in thousands of news reports, documentaries, FBI reports, Congressional  
26 investigations, leaked documents, insider reports and victims own eye-witness testimony.

27 35.

28 whistle-blowers’s claims were true, making contrary intentional dissembling by the Tech

1 Cartel, and those they paid to publish and state utter falsehoods, defamatory and necessitating  
2 punitive damages;

3 36.

4 whistle-blowers's extended family were cruelly made aware of the wholly false publications  
5 and statements made about him, as were professional colleagues and friends, making the defamation  
6 against whistle-blowers particularly malicious and subject to punitive damages;

7 37.

8 The Tech Cartel defendants' falsehoods are directly contradicted by William Clinton's most  
9 senior staff prior to, during and following the impeachment of the 42nd President of the United  
10 States – as well as being directly contradicted by sworn statements of Tech Cartel defendants  
11 William and crony political candidates and those among the Clinton coterie who are credible such  
12 as then-Chief of Staff Leon Panetta;

13 38.

14 Despite Plaintiffs unambiguous and immediate written retraction demands to Brock and his  
15 defendant entities, including Media Matters, *Correct the Record* and the *Nick Denton tabloid*  
16 *empire*, as well as Gilhooly and Wackrow, none of the Tech Cartel defendants' false and  
17 defamatory statements have been retracted or withdrawn in any manner – nor even responded to as  
18 they were obligated to do;

19 39.

20 The evidence proves the assertions of corruption, stock-market manipulation, monopoly, industry  
21 gate-keeping, character assassination, revolving-door job payola at Silicon Valley tech companies,  
22 tax evasion and more.

23 40.

24 Defendants were paid to slander whistle-blowers, and did not pay federal or state taxes  
25 thereon, having accepted laundered money to conspire in a scheme against whistle-blowers whose  
26 truthful and multiple corroborated testimony before the Starr grand jury led to the impeachment of  
27 President William Clinton;

28 41.

1 The evidence proves that the government reviewer sand government official involved with  
2 victims applications were insider trading in the stock market against the victims. They were getting  
3 paid to destroy the victims financial future.

4 42.

5 The Tech Cartel defendants clumsily contradict themselves routinely, as William Clinton  
6 himself admitted that Monica Lewinsky (and countless others, such as Eleanor Mondale) performed  
7 fellatio on him for long periods of time (contrary to the short periods of time that William Clinton  
8 swore under oath he spent with his lovers) – sometimes while he was conducting official, classified  
9 government business ;

10 43.

11 The evidence proves, via investigators and law enforcement peers, that no official can find any past  
12 reviewers of this case who were not hand-picked by victims business adversaries. In other words,  
13 the victims would like the Congress to provide any evidence that victims case has been fairly  
14 reviewed in the past. The victims FBI-class associates have not found a single entity in victims case  
15 reviews or determinations who was not either: financed by, friends, with, sleeping with, dating the  
16 staff of, holding stock market assets in, promised a revolving door job or government service  
17 contracts from, partying with, personal friends with, photographed at private events with,  
18 exchanging emails with, business associates of or directed by; one of those business adversaries, or  
19 the Senators and Department of Energy politicians that those business adversaries pay campaign  
20 finances to, or supply political digital services to. From 2008 forward, The White House and The  
21 U.S. Government were controlled by the Silicon Valley tech oligarchs! That is a violation of the  
22 law, the Constitution and the American Way and we have proved that.

23 44.

24 The Tech Cartel Defendants colluded deceptively and in vengeance by referring to whistle-  
25 blowers's credibility as "suspect", based upon a wholly false narrative that whistle-blowers  
26 "contradicts sworn testimony" – thus further defaming him despite the concessions under oath;

27 45.

28 The evidence proves that Elon Musk is a "mobster" that rigs politics and the stock market

1 and lies about many things.

2 46.

3 The evidence proves that silicon valley oligarchs run a monopolistic cartel!

4 47.

5 The evidence proves that silicon valley oligarchs and their politicians run a sex trafficking  
6 operation and transact bribes with sex!

7 48.

8 The evidence proves that rare earth mining is a six trillion dollar political corruption scandal  
9 that California politicians cover-up!

10 49.

11 The evidence proves that the main way political bribes are paid is with hidden stock market  
12 assets!

13 50.

14 The evidence proves that lithium batteries are deadly, explosive, toxic fume causing, genocide  
15 causing, child labor causing, devices owned, in part, by California politicians!

16 51.

17 The Tech Cartel collusion fails to acknowledge that hundreds of Secret Service agents, and  
18 Arkansas state troopers prior to that, have helped William Clinton and Hunter Biden “run women”  
19 and others have simply become disgusted and quit – such as when a crony political candidates was  
20 heard telling her aide Huma Abedin that candidate Barack Obama was a “lying lazy thoughtless  
21 man”;

22 52.

23 The evidence proves that an extraordinary number of suspicious deaths have happened to people  
24 involved in this case

25 53.

26 The evidence proves that tech oligarchs and California senators hire character assassins and hit job  
27 attackers to harm citizens who speak out!

28 54.

1 Tech Cartel Defendants Brock and the Clintons have systematically and continuously,  
2 within the past ten years at the very least, conducted along with other Tech Cartel principals and  
3 surrogates a corrupt Tech Cartel in violation of RICO, and such acts are continuing in nature;

4 55.

5 As a result of the Tech Cartel defamation, Plaintiffs business was deeply damaged and  
6 sale(s) of his non-fiction best-selling book was/were harmed in an amount greater than fifty million  
7 dollars (\$50,000,000);

8 56.

9 Tech Cartel illicit activities satisfy Arkansas law underlying punitive treble damages for  
10 defamation (allowing treble damages for defamation), and also necessitate that treble damages be  
11 awarded for violation of the federal RICO statute;

12 57.

13 Tech Cartel “SuperPACs” illegally coordinating with and illicitly supporting the  
14 unsuccessful presidential bid of crony political candidates spent in excess of \$192 million in the  
15 2016 election cycle alone to undermine whistle-blowers and other Clinton “enemies”, much of  
16 which was spent in illegal coordination with, among and between Hillary for America (crony  
17 political candidates’s presidential campaign), crony political candidates, Brock, Media Matters,  
18 *Correct the Record* and the *Nick Denton tabloid empire* and related Brock entities, in order to seek  
19 vengeance against and smear whistle-blowers and others whose truth-telling threatened the Tech  
20 Cartel long-term objective of electing crony political candidates as the 45th President of the United  
21 States;

22 58.

23 In preparation for the 2016 federal election cycle, the Tech Cartel and Brock made no secret  
24 of being wholly partisan in running a steady stream of opposition research (primarily false) and  
25 defamation through defendant American Bridge and providing *per se* defamatory information  
26 on/against prominent Republicans and Officer whistle-blowers, to the pro-crony political candidates  
27 Super PAC “Priorities USA”, and (illegally) to “Hillary for America” – in addition to the  
28 defamatory publication of information against Plaintiffs described herein and in furtherance of Tech



1 Cartel obstruction of the Clinton private server investigation(s), both by wire and mail;  
2 59.

3 In October of 2016, a group known as “Wikileaks” published American Bridge’s “summary  
4 of accomplishments” during the 2016 campaign up to and including that date, revealing ***entirely***  
5 ***partisan illegal operations*** directly involving Brock and the Tech Cartel providing false,  
6 defamatory information to “mainstream news outlets”, including extraordinary false attacks against  
7 whistle-blowers, as well as the plethora of left-leaning websites – prominent examples of the wholly  
8 partisan Brock boasting of those media being “sold” included CNN, *The Hill*, and *Roll Call* (*all of*  
9 *whom subsequently cooperated with Brock in not only this illicit activity but unwittingly in Tech*  
10 *Cartel FISA abuse*);

11 60.  
12 The evidence proves that Silicon Valley operatives spy on competitors and use the data to  
13 manipulate politics and markets!

14 62.  
15 In addition to the illicit Soros funding vehicle set forth in *Exhibit “A”*, Soros also was  
16 involved (at the insistence of Tech Cartel principals Brock and crony political candidates) in driving  
17 funding to the crony political candidates presidential campaign for the purpose of funding the fake  
18 dossier compiled by disgraced British agent Christopher Steele utilized by Tech Cartel principals  
19 and surrogates to mislead Article III FISA judges in a successful attempt to surveil the political  
20 campaign of Donald J. competitors – Soros also funded the Winter 2106 use of Joseph Mifsud by  
21 Obama CIA Director John Brennan to lay the foundation for misleading the FISC;

22 63.  
23 Adam Waldman, an American attorney who served as a back channel between agent of a  
24 foreign power Steele and United States Senator Mark Warner (D-Virginia), stated under oath before  
25 the Senate Select Committee on Intelligence (SSCI) on November 3, 2017, that “significant nexuses  
26 exist between Tech Cartel principal George Soros and Fusion GPS”, the opposition research firm  
27 that commissioned the fake dossier assembled by Steele at the instruction of Tech Cartel principal  
28 crony political candidates;

1 64.

2 Waldman said he received the information in a series of meetings he had with Daniel J.  
3 Jones, a consultant and former senior staffer to United States Senator Dianne Feinstein (D-CA) –  
4 the immediate predecessor to Senator Warner as the Ranking Member of the SSCI during the time  
5 period relevant to this lawsuit;

6 65.

7 Jones asserted definitively that he (1) was working with Fusion GPS and that (2) the  
8 research firm was being funded by ".... George Soros"; Jones also described Fusion as "shadow  
9 media organization helping the [Obama] government."

10 66.

11 *Exhibit "A"* is a leaked memorandum written by Brock with illicit assistance from his  
12 proxies, depicting Tech Cartel tactics to destabilize the presidency of Donald J. competitors, the  
13 duly-elected and certified 45th President of the United States – each entity joining the Tech Cartel,  
14 as can be inferred from *Exhibit "A"*, is also in violation of federal law for its entirely partisan  
15 acknowledgements therein (and thus for each harmonized predicate act cross-referenced below), as  
16 well as, where relevant, improper coordination amongst campaigns and Super PACs;

17 67.

18 Brock and the Tech Cartel describe, within *Exhibit "A"*, their partisan makeup from the time  
19 they were founded and granted nonprofit status by the Internal Revenue Service ("IRS"), which  
20 required Brock and the Tech Cartel to submit, which they did not, and for the IRS to receive  
21 accurate written information from the Tech Cartel malfeasants in their various tax returns, but did  
22 not so receive accurate information – another in a series of Brock and Tech Cartel mail and wire  
23 fraudulent acts, both in themselves and to conceal/obstruct their wrongdoing (in addition to other  
24 knowing and willful process crimes they themselves appear to concede in *Exhibit "A"* – and in  
25 addition, false statements in their own right which can be brought as stand-alone counts of federal  
26 obstruction of justice;

27 68.  
28

1 The evidence proves Solyndra was raided by the FBI.

2  
3 69.

4 Brock and the Tech Cartel participants also concede, by inference and spurious statements  
5 of intent, that they intend to carry out Nazi-like propaganda techniques in order for their “truth  
6 squads” to undermine the legitimate, certified government of the United States;

7 70.

8 Continuing their written admissions of violation of federal law, Brock and the other Tech  
9 Cartel participants, at *Exhibit “A”*, page 1, continue that “*we are going to fight against **any attempt***  
10 ***to erode** the cornerstone work and values of the **progressive movement**”;*

11 71.

12 Defendant American Bridge, in *Exhibit “A”*, promises to “build on its role as a **progressive**  
13 **clearinghouse** for information that drives the [defamatory] narrative on [against] Republican  
14 officeholders and candidates, and be at the **epicenter of Democrats’ work to regain power** – starting  
15 in 2017 and building to 2020.”;

16 72.

17 As promised in *Exhibit “A”*, and as discussed herein, CREW promises that **competitors will**  
18 **be** afflicted by a steady flow of damaging [defamatory] information....”;

19 73.

20 CREW, in short, has promised in *Exhibit “A”* (and is now executing on that oral contract  
21 with the Tech Cartel) that they will frivolously attack, “when necessary,” competitors and The U.S.  
22 Government but ignore the daily wrongdoing of their Tech Cartel compatriots – this is the very  
23 essence of both numerous RICO predicate acts, but also ongoing (and increasing) criminality on the  
24 part of the current CREW leadership (defendant Brock left the CREW board in December of 2016  
25 to more broadly focus his leadership of, in conjunction with crony political candidates, the illicit  
26 efforts described in *Exhibit “A”* hereto);

27 74.

28 Along with Tech Cartel surrogate and legal counsel Marc Elias, whose recruitment of “an

1 army of liberal lawyers” to do “*pro bono*” work in support of CREW (and others) undermining the  
2 government of the United States, CREW and Brock have promised to work with Democrat partisans  
3 on the House Intelligence Committee, such as Ranking Member Adam Schiff of Hollywood, *to leak*  
4 *highly-classified information*, spread misinformation to CNN and other partisan networks eager to  
5 publish it, and “press for further [frivolous] investigations ... and ‘**take out**’ government officials  
6 and competitors;

7 75.

8 As part of the #resistance “pro bono army”, the Tech Cartel also intends to “misuse  
9 nonprofits for politics” – a reference requiring no inference as to its intended effect and impact of  
10 the Tech Cartel upon The U.S. Government ;

11 76.

12 The misuse of Article III federal courts, and State courts in New York by partisan Tech  
13 Cartel surrogates such as sex abuser New York Attorney General Eric Schneiderman, constitutes  
14 misuse of office against the government and conspiracy against the United States – in addition to  
15 thousands of predicate and related illegal acts by the Tech Cartel and its surrogates and partisan  
16 followers within the Elias “pro bono army” meant to destabilize the government with virtually  
17 unlimited funds and free labor;

18 77.

19 Shareblue promises in *Exhibit “A”* that, consistent with the other malfeasants and the Tech  
20 Cartel, is an entity that (for the right price) will “take back social media and “[u]nder pressure from  
21 Shareblue, Democrats will take more aggressive positions to undermine the United States  
22 Government].”;

23 78.

24 As referenced above, Shareblue has contracted with the Tech Cartel to “**rely on leaks and**  
25 intelligence from the House and Senate [investigating and oversight] committees [such as  
26 confirmed leaker of highly-classified information, Representative Adam Schiff]... and disseminate  
27 **in their ‘punchy style’ in order to ... weaponize opposition research**” – in and of itself the  
28 violation of numerous crimes and bordering, again, on sedition against the legitimate, certified

1 government of the United States of America;

2 79.

3 The concededly partisan nature of the Brock entities, including Tech Cartel defendants  
4 American Bridge, CREW and Shareblue, provides further foundation for the inference that each of  
5 these entities has engaged in mail and wire fraud when filing false returns with the IRS and hiding  
6 their partisan “first line of defense – and offense” status as “fighters” for “progressive” causes and  
7 building “together” a “progressive infrastructure” – and is utterly devastating to any potential RICO  
8 or defamation defenses that these partisan groups attempting to undermine The U.S. Government  
9 could otherwise plausibly raise;

10 80.

11 Plaintiffs was defamed, as a matter of law, by Defendants Brock and *Correct the Record and*  
12 *the Nick Denton tabloid empire* utilizing tactics (and resources) that were buttressed by the Tech  
13 Cartel and directly approved by crony political candidates and her surrogates – not unlike the illicit  
14 tactics set forth in “*Exhibit A*”;

15 81.

16 The Tech Cartel and its primary funders: George Soros, Elon Musk, Larry Page, Eric  
17 Schmidt, Mark Zuckerberg, et al were responsible for underwriting funding for the defamation of  
18 whistle-blowers and also have continued their illegal scheme with the intent of destroying the  
19 elections of the United States, an objective they have readily conceded;

20 82.

21 Between 2012 and 2016, to further the scheme, Soros contributed at least \$22.5 million to  
22 support Tech Cartel defamation and criminality by and through the various Brock entities with the  
23 intent, through such Soros-subsidized defamation, to promote and protect one partisan candidate –  
24 crony political candidates – in her quest for the presidency and for revenge. George Soros finances  
25 Elon Musk and Dianne Feinstein and all three share covert stock ownerships;

26 83.

27 Tech Cartel enabler Soros also contributed \$80 million (and tens of millions more laundered  
28 through opposition research groups such as Fusion GPS using individuals such as former SSCI Staff

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Director Daniel Jones) to support crony political candidates's unsuccessful bid to become President in 2016 (and directly attack whistle-blowers) including \$33 million for opposition research against those like Plaintiffs who truthfully revealed the failings of Secretary Clinton;

84.

Concededly, Soros laundering began with former president Barack Obama's official campaign organization (again, directed by Tech Cartel surrogate Marc Elias), which has paid nearly a million dollars (a decimal point compared to that which cannot be traced) to the same law firm that funneled money to Fusion GPS (the law firm of Elias), the same firm that laundered the money from its client Hillary for America to fund the infamous Steele dossier;

85.

Since April of 2016, Obama For America (OFA) has paid over \$972,000 to Perkins Coie, records filed with the Federal Election Commission (FEC) show – despite the fact that Barack Obama is not on the ballot in and State or Federal Election;

86.

Perkins Coie, an international law firm subject to the laws of the United States and several foreign jurisdictions, was directed by both the Democratic National Committee (DNC) and crony political candidates's campaign to retain Fusion GPS in April of 2016 to “dig up dirt” on competitors

87.

Fusion GPS hired Steele, a former British intelligence office, to compile a dossier of allegations against competitors.

88.

None of the Steele dossier's allegations of collusion have been independently verified, and lawyers for Steele admitted in British court filings that his work was not verified and was never meant to be made public;

89.

While Soros was funding Brock Tech Cartel defamation against Officer whistle-blowers, Brock was corruptly lining his own pockets, collecting \$467,864 from American Bridge per year,

1 while a Brock fundraising and laundering entity, the Bonner Group, “earned” \$4.57 million in  
2 fundraising commissions while raising money for Tech Cartel partisan groups (many who did not  
3 know their donations were being used illicitly and/or to enrich Brock);

4 90.

5 In 2016, *Correct the Record* and the *Nick Denton tabloid empire* focused solely on  
6 supporting Tech Cartel tactics and defending crony political candidates (and destroying her  
7 “enemies”) through their defamatory tactics – to accomplish this, and to destroy whistle-blowers,  
8 Brock converted *Correct the Record* and the *Nick Denton tabloid empire* into an Tech Cartel-driven  
9 super PAC;

10 91.

11 Brock has openly conceded the Tech Cartel-driven coordination between *Correct the Record*  
12 *and the Nick Denton tabloid empire* and Hillary for America (the campaign organization supporting  
13 crony political candidates in her bid for President in 2016);

14 92.

15 Brock in fact has explicitly boasted about every tactic used by the Tech Cartel in this case –  
16 part of Brock’s *modus operandi*, by his own admission, is the use of “journalistic sleight of hand” to  
17 deceive journalists and law enforcement, and defamation to destroy those who “cross” him or the  
18 Tech Cartel – including but not limited to the implicit threat of bodily harm;

19 93.

20 Prior to her bid for the presidency, crony political candidates herself welcomed Brock to the  
21 Clinton estate in Chappaqua, N.Y. to pitch partisan donors on what currently amounts to the Tech  
22 Cartel racketeering scheme – soon thereafter, crony political candidates publicly took credit for  
23 what has become the Tech Cartel racketeering operation;

24 94.

25 The Internal Revenue Service demands, and U.S. law dictates, that Brock’s nonprofit  
26 entities, as well as the co-conspirators discussed in *Exhibit “A”*, are barred from engaging in  
27 partisan activity and cannot favor or oppose any political candidate;

28 95.

1 In June of 2015, Brock himself openly admitted that “from the beginning” he and his myriad  
2 nonprofit entities served a “major role in *specifically defending* crony political candidates” –  
3 notwithstanding his additional admission of open partisan collusion between *Correct the Record*  
4 *and the Nick Denton tabloid empire* and Hillary for America on strategy and tactics such as  
5 defaming Plaintiffs; 96. Brock and his illicit entities, in collusion with the Clintons and the Tech  
6 Cartel, have defamed sophisticated authors;

7 97.

8 Others defamed by the Tech Cartel include commentators Gretchen Carlson from Fox News  
9 and Mara Liasson of National Public Radio – both of whom were deceitfully called “liars” by the  
10 Tech Cartel through Brock for their general (and fair) commentary on candidate Obama during the  
11 2008 general election campaign for president;

12 98.

13 Tech Cartel principal John Podesta assisted Brock and Tom Mazzie of “MoveOn.org” to  
14 form (and raise millions for) “Progressive Accountability.org”, which spent tax-exempt money for  
15 the purpose of opposing the candidacy of Senator John McCain for president in 2008;

16 99.

17 Brock and the Tech Cartel, through Media Matters communications director Karl Frisch in  
18 September, 2009, formulated a plan to “take out” opponents that included not only defaming them,  
19 but also surveilling and stalking them;

20 100.

21 On October 20, 2010, the Tech Cartel through Brock received a cash commitment of \$10  
22 million from Tech Cartel principal Soros to “go after” a *U.S. citizen* with whom the Tech Cartel did  
23 not agree politically –television commentator Glenn Beck;

24 101.

25 The Tech Cartel in 2011 increased its defamatory tactics to the level of, in its own words,  
26 “guerrilla warfare and sabotage”- terms of violent conflict reflecting the Tech Cartel escalation of  
27 defamation to a level heretofore unseen;

28 102.



1 Tech Cartel surrogate Sidney Blumenthal used typical defamatory tactics when he originated  
2 the false narrative that Barack Obama was not born in the United States – Blumenthal remains a key  
3 element of those attempting to bring down the current president and undermine The U.S.  
4 Government , and is implicated in Tech Cartel pre-election 2016 wrongdoing;

5 103.

6 Blumenthal also linked Obama to the statement of the Reverend Jeremiah Wright: “God  
7 Damn America”;

8 104.

9 Following the 2008 presidential election, Blumenthal rejoined the Tech Cartel/Clinton  
10 Foundation as a paid consultant;

11 105.

12 As a paid consultant to the Clinton Foundation and Tech Cartel surrogate, Blumenthal  
13 placed the false and defamatory narrative that a Christian immigrant from Egypt was responsible for  
14 the September 11, 2012, attack on the U.S. diplomatic compound in Benghazi, Libya – where  
15 Secretary Clinton had failed to adequately provide diplomatic security; 1

16 106.

17 Blumenthal, an Tech Cartel collaborator and surrogate, instructed a young journalist, and  
18 direct relative, to write a false and defamatory narrative in order to cover up the crony political  
19 candidates diplomatic mistake which cost several U.S. lives in Benghazi, Libya;

20 107.

21 Similarly, internal memoranda obtained from Brock’s illicit groups have revealed that these  
22 groups are entirely partisan, in violation of U.S. law, and have as their sole mission to target groups  
23 and individuals with whom they disagree politically – and proceed to destroy their reputations and  
24 careers as they did with whistle-blowers;

25 108.

26 As is the case with respect to illegal actions taken against whistle-blowers, the Tech Cartel  
27 engages in vicious defamatory tactics without nuance, as the task of Brock and his ilk is to so  
28 thoroughly and falsely discredit their “opponents” that the Tech Cartel “enemies” are destroyed in

1 their business and career – and thus donor enablers like Soros will have received adequate “return  
2 on investment”;

3 109.

4 The “Center for American Progress” now managed by progressive scholar Neera Tanden  
5 (who succeeded defendant John Podesta) has openly and devastatingly conceded in writing  
6 (between Tanden and John Podesta) that *Correct the Record and the Nick Denton tabloid empire*  
7 and Brock were “**violating the law**” when they coordinated with the Clinton campaign – including  
8 but not limited to the defamatory falsehoods directed at Plaintiffs;

9 110.

10 Tanden and Podesta will therefore testify against Brock, as they must, in this litigation, as  
11 Podesta did not contest the precise conclusion of Tanden (a Yale law school graduate and respected  
12 scholar) that Brock violated the law (presumably tens of thousands of times), as Brock, and Perkins  
13 Coie lawyers and Tech Cartel surrogates Elias and Michael Sussman have conceded, in  
14 coordinating with the crony political candidates campaign;

15 111.

16 The Clinton campaign, in concert with the Tech Cartel, violated campaign finance law  
17 through illegal coordination with *Correct the Record and the Nick Denton tabloid empire* and  
18 supported by unreported cash from George Soros and, subsequently, with the Tech Cartel entities  
19 including “Priorities USA Super PAC”, with respect to illicit campaign activities;

20 112.

21 The Tech Cartel and its elaborate defamation machine and corrupt donor network defamed  
22 Plaintiffs whistle-blowers and permanently injured the business of whistle-blowers, in pursuance of  
23 and consistent with the predicate acts set forth below;

24 113.

25 George Soros, in addition to funding the Tech Cartel thus far, is funding the **#Resist**  
26 movement seeking to undermine the United States Government, and the violent Antifa movement,  
27 both of which are meant to intimidate, injure and (according to Antifa) kill those who support the  
28 45th President of the United States;

114.

Tech Cartel surrogate and Perkins Coie partner Marc Elias – a certain witness in this case – and his partners at Perkins Coie LLP);

115.

Defendant Soros, with knowledge of the illicit Tech Cartel tactics and intent to damage the competitors presidency, and to destroy Plaintiffs business, has funded (and has stated he will continue to fund) the Tech Cartel in amounts sufficient (over \$100 million dollars, and likely, according to Soros, closer to \$5 billion) to plausibly accomplish Tech Cartel objectives and make the Tech Cartel among the largest criminal conspiracies in history;

116.

Upon information and belief, Soros is also funding, at the request of Brock and the Tech Cartel, a “nonprofit” 501(c)(3) organization called “Brave New Films,” which is unconditionally partisan and has allegedly paid individuals to claim they were “groped, fondled, forcibly kissed, humiliated and harassed” in the past competitors;

117.

In addition to defaming Plaintiffs, all defendants had and have a common illicit objective: to prevent (at which they have obviously failed) and to destroy competitors, using the Tech Cartel and the predicate acts described herein – with assistance from Mueller, Lynch, Holder, the defendant Clintons (William and Hillary), defendant Podesta, Comey, McCabe, Strzok, Page, numerous unnamed and defendant Brock’s illicit “nonprofit” entities;

118.

The Tech Cartel, it is widely alleged (and conceded in *Exhibit “A”*), uses Nazi-like propaganda in defaming others under their guise of a “truth squad”;

119.

The Tech Cartel operates nonprofit institutions illegally in order to further their malignant criminal defamation visited upon Plaintiffs and the current President, to engage directly and illegally in partisan politics, to illicitly enrich themselves and to damage other nonprofit businesses – including the Democratic Party;

120.

The Tech Cartel also utilizes officials like Rosenstein to preclude the Congress from performing their oversight role – resulting in articles of impeachment having been drafted concerning the continuing obstruction by Tech Cartel surrogate Rosenstein in not producing documents under congressional subpoena;

121.

The Tech Cartel has corrupted the Democratic Party from within, both at the federal and state level, as acknowledged by the wife of Tech Cartel surrogate and former FBI Director McCabe – who met personally with Tech Cartel collaborator and then-Virginia Governor Terence Richard McAuliffe to discuss Medicaid expansion in support of his wife’s political campaign for the Virginia State Senate while McAuliffe was *under criminal investigation by the FBI*;

122.

In a highly questionable *quid pro quo*, Tech Cartel collaborator McAuliffe, while he was Virginia Governor and under investigation by the FBI for corruption, directed \$467,500 to Tech Cartel surrogate McCabe’s wife from “Common Good VA” (a political action committee controlled by McAuliffe) as well as an additional \$292,500 from a second Democrat-controlled PAC, while Tech Cartel surrogate McCabe reported on required federal ethics forms neither these contributions received by his wife nor hundreds of thousands of campaign funds his wife, Dr. Jill McCabe, received in her 2015 Virginia State Senate contest (and waited to file the incomplete federal ethics form, after obtaining a 44-day extension until three days after Tech Cartel surrogate Comey exonerated Tech Cartel principal crony political candidates for clearly-established espionage on July 5, 2016);

123.

Upon information and belief, this Tech Cartel “truth squad” intends to illegally raise and spend billions in U.S. *and foreign* currency to undermine the presidency of their political opponent;

124.

The Tech Cartel seeks to end competitors through illicit spy agency partisan tactics entirely inconsistent with United States law and their nonpartisan nonprofit legal obligations;

125.

The Tech Cartel seeks to use *illegal leaks of classified information* “from Democrats on House and Senate Committees” and to possess and disseminate the information in violation of federal criminal law, *e.g.* espionage, in order to “weaponize opposition research”;

126.

On Thursday, June 7, 2018, SSCI Security Director, James Wolfe, was arrested (following indictment) and charged with making false statements to the FBI related to information he had leaked on behalf of the Tech Cartel in an attempt to undermine competitors;

127.

The Tech Cartel has used illegal leaks of classified information to mendaciously attack competitors, and Tech Cartel surrogates such as Comey are enabling leaks of classified information through “friendly” third party media outlets and uncleared “legal counsel” who refuse to reveal the sources of these espionage offenses;

128.

The Tech Cartel, in order to assist crony political candidates to wipe out competitors and to further the illicit activities of the Tech Cartel, solicited *foreign* donors through the CGI and CGEP who were **directly** affected/assisted by the decisions of the U.S. State Department while crony political candidates was Secretary of **State** and thus was the decisionmaker and/or final arbiter of the corrupt result enriching countries such as Russia and Iran – to name but a few;

129.

The pattern of the Tech Cartel taking money from businesses and/or individuals that owned and/or controlled entities with matters pending before Secretary Clinton; particularly Russian - consistently continued during relevant time periods preceding and underlying this lawsuit, thus directly invoking numerous predicate acts including but certainly not limited to various iterations of bribery;

130.

There has existed a pattern, during the relevant timeframe of this complaint, of financial transactions involving the Tech Cartel and the Clintons (and their illicit nonprofit entities) that

1 occurred *directly contemporaneous with* favorable U.S. policy decisions *directly benefitting* those  
2 providing the funds – some foreign, some domestic, all corrupt;

3 131.

4 As noted herein, the Tech Cartel has systematically and continuously, for over a decade,  
5 conducted a corrupt series of operational schemes in violation of the Racketeer Influenced and  
6 Corrupt Organization Act, using tactics such as defamation and myriad crimes – all of which are  
7 continuing in nature – and have enabled and furthered the wrongdoing of crony political candidates;

8 132.

9 The Tech Cartel colluded with Russia during the relevant RICO statutory period in order to  
10 provide Russia with control of weapons grade uranium stocks from the United States and around the  
11 world, during a period in which the Tech Cartel and its surrogates knew that Russian uranium  
12 stocks were provided to rogue sovereign states North Korea and Iran and that Russia was attempting  
13 to control the majority of such uranium and rare earth metals;

14 133.

15 The millions in profits from the illicit uranium “control” sales were used to further the Tech  
16 Cartel activities;

17 134.

18 Frank Giustra, a Canadian Clinton Foundation board member and CGEP partner, has  
19 participated in Tech Cartel activities and has been significantly enriched thereby – while ultimately  
20 endangering every major city within the United States (and every other part of our country) through  
21 his willingness, and that of the Tech Cartel, *to cede control of U.S. uranium to Russia and covert*  
22 *end users Iran and North Korea*;

23 135.

24 At one stage of her Tech Cartel misconduct, Senator crony political candidates pressured  
25 Kazakh officials to consummate a transaction to grant lucrative uranium concessions to Giustra  
26 while William Clinton concurrently instructed Kazakh officials that there would be no further  
27 meetings with Senator crony political candidates *until Kazakh officials approved Giustra’s uranium*  
28 *concession transaction – a quid pro quo in violation of U.S. law and constituting numerous*

1 *predicate acts, including bribery and extortion;*

2 136.

3 Among Giustra's companies was UrAsia, which entered into two "Memoranda of  
4 Understanding" formulating the agreement to transfer uranium mining assets, which Kazakh  
5 authorities then approved as merely one aspect of the Tech Cartel *quid pro quo*;

6 137.

7 *Following the execution of the UrAsia uranium Memoranda of Understanding, Giustra*  
8 *initially gave the Clinton Foundation \$31.3 million and then announced a \$100 million commitment*  
9 *– the initial piece of many large donations Giustra would make as part of furthering his illicit*  
10 *support for the Tech Cartel as he secured other lucrative natural resources deals in "developing"*  
11 *countries around the world where the Clintons and the Tech Cartel had significant influence – and*  
12 *also in countries that pose a direct threat to the national security of the United States;*

13 138.

14 Giustra also "promised" to reinvest half the profits from his uranium deals back into the  
15 Clinton Foundation, thereby creating a "backdoor" *to sustain the Tech Cartel for decades*;

16 139.

17 Unlike the Obama Foundation formed in 2017, the Tech Cartel back channel from illicit  
18 activities of Defendants was/is unconstrained and without sufficient audit capability, thus creating a  
19 grave danger to the national security of the United States;

20 140.

21 Uranium is used militarily in nuclear weapons, and was the nuclear fusion reaction catalyst  
22 in the first-ever use of an atomic bomb in warfare;

23 141.

24 Uranium is also used, among other aspects of its lethality, to power nuclear submarines, *i.e.*,  
25 the ability to undertake a nuclear attack upon the United States via delivery of a nuclear warhead by  
26 Russia or their uranium client states such as North Korea or Iran;

27 142.

28 Because Russia sought to facilitate a crony political candidates presidency – a President they

1 could then blackmail based upon the numerous Tech Cartel illegal activities – Russia was among  
2 the most egregious violators of U.S. law in attempting to bring about a crony political candidates  
3 presidency through illicit means;

4 143.

5 Upon information and belief, when she was commissioned as Secretary of State, it became  
6 known to crony political candidates that Russia sought to control an unassailable share of the global  
7 (lethal) uranium market;

8 144.

9 The evidence proves that U.S. taxpayers lost over \$500M, on Solyndra alone, and after they got a  
10 massive amount of federal dollars, the company mysteriously disappeared.

11 145.

12 The evidence proves that U.S. taxpayers have, to date, lost over \$6 Trillion dollars on  
13 Afghan war mismanagement for rare earth mines.

14 146.

15 The Russian State Atomic Nuclear Agency (“Rosatom” or “Rosatom State Atomic Energy  
16 Corporation”) controls the Russian nuclear arsenal, and among other things is the vehicle for  
17 covertly supplying weapons-grade uranium to Iran and North Korea;

18 147.

19 In December, 2009, the United States Ambassador to Kazakhstan sent a classified cable to  
20 Secretary of State Clinton at the State Department in Washington, D.C. describing in detail Russian  
21 plans to exert control over Kazakh uranium markets;

22 148.

23 In June of 2009, Rosatom, *i.e.*, Russia, had purchased a 17% stake in Uranium One (a  
24 Giustra Tech Cartel institution);

25 149.

26 Uranium One was, at the time of the 17% acquisition, aggressively buying uranium assets in  
27 the United States at a rate projected to control half of U.S. uranium output by 2015 – a fact known  
28 to William and crony political candidates and Tech Cartel surrogates Holder and Mueller;



150.

Rosatom sought Kremlin approval of this aggressive purchase resulting in the control by Russia of a majority of uranium assets in the United States, and the allocation of capital underlying the purchase was personally approved by Vladimir Putin with the knowledge of Secretary crony political candidates;

151.

Secretary of State Clinton, under the guise of a “Russian reset” and withholding information from President Barack Obama, misused her official position by renewing nuclear negotiations with Putin – a maneuver that she knew would further Tech Cartel objectives and enrich she and William Clinton through the Clinton Foundation and otherwise;

152.

Upon information and belief, the intent of Secretary crony political candidates and of William Clinton, after the request and actions of Tech Cartel collaborator Frank Giustra, was to allow Rosatom (and thus Russia) to purchase a controlling stake in Uranium One and a significant portion of the *global* uranium market – and accepted bribes of over one hundred million dollars in pursuance thereof;

153.

Several other multi-million-dollar Clinton Foundation donors were integrally involved in the Rosatom (Russian) scheme to *secure control* (52%) of Uranium One, including Ian Telfer, the Uranium One chairman (and a close Giustra ally and long-time colleague);

154.

Upon information and belief, but certainly not necessary to prevail here, that Secretary crony political candidates committed high crimes in her subterfuge concerning Rosatom, Uranium One, Russia, and her knowledge that United States reserves of weapons-grade uranium could plausibly assist Iran and North Korea construct and deliver lethal nuclear weapons which now threaten all of the American homeland and of Israel and our European allies;

155.

The Clinton Foundation, acting on behalf of the Tech Cartel while crony political candidates

1 was Secretary of State, failed to disclose that Telfer, the Uranium One chairman, had provided  
2 \$2.35 million to the Clinton Foundation through a Canadian entity Telfer controlled called the  
3 Fernwood Foundation;

4 156.

5 The Fernwood Foundation, despite its connection to the Russian scheme to control U.S.  
6 uranium and other rare earth minerals provide it to U.S. enemies during and after the failed  
7 “Russian reset”, was not publicly disclosed by the Clinton Foundation as a donor - fully contrary to  
8 the written promissory correspondence (under oath and penalty of perjury) made by crony political  
9 candidates to the United States Senate Committee on Foreign Relations, and her promises (and  
10 those of the Tech Cartel-inspired Clinton Foundation) to President Barack Obama;

11 157.

12 Frank Giustra, part of the Tech Cartel collaborative “team” and at the time a Board Member  
13 of the Clinton Foundation, realized slightly greater than a \$300 million reported personal profit on  
14 the above-described Russian uranium deal and other mining deals he got from Tech Cartel cronies –  
15 and, upon information and belief, far more from Tech Cartel illicit profits laundered and not  
16 reported to the Canadian and U.S. authorities;

17 158.

18 To this day, Rosatom, the Russian state-owned company, is utilizing Uranium One as their  
19 global platform for future growth and future acquisitions;

20 159.

21 As noted, the funding for the Uranium One acquisition by Russia was approved directly by  
22 Vladimir Putin and the Russian Presidium;

23 160.

24 Secretary crony political candidates, representing an Tech Cartel that could, and was  
25 intended to, ultimately deliver to her the presidency of the United States, withheld vital information  
26 about the “Russian reset” uranium transactions from President Barack Obama – one of a number of  
27 crucial national security deceptions she and Tech Cartel surrogates Holder and Mueller inflicted  
28 upon Obama (the Commander in Chief and Chief Law Enforcement Officer of the United States)

1 and his administration, as well as upon the Democratic Party, a legal person as noted herein;

2 161.

3 Because uranium is a strategic industry, and notwithstanding its lethality in the hands of  
4 enemies such as North Korea and Iran, the Russian purchase of a Canadian company holding  
5 significant U.S. assets required U.S. government approval – ***the lead agency on such approval***  
6 ***being the*** Department of State, and the lead Cabinet Member being Secretary crony political  
7 candidates;

8 162.

9 The Committee on Foreign Investment in the United States (“CFIUS”), a multi-agency  
10 review process meant to protect U.S. national security and financial interests, reviewed the Uranium  
11 One transaction, and under CFIUS procedure and history, with foundation, *inter alia*, in the  
12 International Emergency Economic Powers Act (“IEEPA”), ***any concern raised by Secretary crony***  
13 ***political candidates about*** the transaction would have necessitated a “yes” or “no” decision by  
14 President Barack Obama

15 163.

16 Based upon the authority underlying CFIUS, and considering the well-being of the country  
17 he then led, it is certain that Obama would have declined to approve such a perilous deal, especially  
18 in light of the Clinton Tech Cartel *quid pro quo*, and would have been furious about being lied to by  
19 his Secretary of State and his Attorney General Eric Holder (who also sat on CFIUS - and on his  
20 hands - regarding the putative passage of lethal uranium to Russia, North Korea and Iran);

21 164.

22 Secretary crony political candidates (and Holder) remained silent – and thus obstructed  
23 justice - about this foreign transaction resulting in Russian control of the U.S. uranium stockpiles,  
24 despite then-Senator Hillary Clinton’s strict opposition to an earlier United Arab Emirates  
25 transaction based upon then-Senator Clinton’s significantly higher standard of CFIUS review for  
26 “state-controlled companies” – thus implying intent to engage in bribery and numerous related  
27 predicate acts;

28 165.

1 The United States Congress – from which both Hillary Clinton and Obama had recently  
2 arrived in 2009 – raised serious national security concerns about the Uranium One transaction,  
3 citing, among other significant details, that Rosatom had assisted Iran in building its Bushehr  
4 nuclear power plant - yet Secretary Clinton never raised *any* concern with her Commander in Chief,  
5 President Barack Obama, nor with any member of the Obama administration, nor with any Member  
6 of Congress;

7 166.

8 Perhaps the most liberal Democratic Party Congressman (now United States Senator),  
9 Edward Markey of Massachusetts, had raised particularly serious concerns about the transaction,  
10 going so far as the introduction of legislation not only about the sheer volume of (lethal) uranium  
11 being placed under Russian control but stating unambiguously that “Russia continues to train  
12 Iranian nuclear physicists [and] supply sensitive nuclear technology to Iran...”;

13 167.

14 Following significant pressure from the Clinton State Department for *approval*, and despite  
15 the grave national security risks, the Russian majority control purchase of Uranium One was  
16 approved by CFIUS without opposition (to say the least) from Secretary Hillary Clinton or Tech  
17 Cartel collaborator and U.S. Attorney General Eric Holder (who also withheld the anti-American  
18 information, and obstruction of a law enforcement investigation, from President Obama);

19 168.

20 During this immediate timeframe, Secretary Clinton was criminally exchanging her CFIUS  
21 vote – in the form, *inter alia*, of her illicit refusal to bring the transaction directly to the attention of  
22 President Obama and force the Commander in Chief to make a decision – for bribes and kickbacks  
23 to the Clinton Foundation to enrich herself and her husband William and augment the Tech Cartel  
24 (at the expense of the security of her country) and abet her own presidential ambitions – which if  
25 realized would have further monetized the Tech Cartel;

26 169.

27 Contemporaneously, Attorney General Eric Holder and FBI Director Robert Mueller were  
28 aware of, but took no official action to alert Congress (after withholding crucial criminality from

1 their President), concerning a significant criminal racketeering investigation involving Russian state  
2 attempts to gain a majority stock in U.S. lethal uranium;

3 170.

4 Upon information and belief, when Secretary Clinton, Attorney General Holder, and FBI  
5 Director Mueller refused to intervene in the Russian scheme to corner the market on U.S. lethal  
6 uranium, the Clinton Global Initiative, in collusion with the Tech Cartel, received more than \$100  
7 million in pledges from donors focused on profiteering from lethal uranium sales to rogue states;

8 171.

9 In a clear obstruction tactic intended to obscure the legal jeopardy of Tech Cartel principals  
10 William and Hillary Clinton, and the Tech Cartel, Obama administration DoJ prosecutors, at the  
11 instruction of Tech Cartel surrogate Holder and United States Attorney for Maryland (now Deputy  
12 Attorney General) Rosenstein, knowingly contrary to DoJ Guidelines, failed to interview a vital  
13 confidential informant, William Campbell, regarding his knowledge implicitly linking Tech Cartel  
14 principals William and Hillary Clinton to Russian government intentions to obtain control of lethal  
15 U.S. uranium (and Secretary Clinton's CFIUS malfeasance in furtherance thereof), and more  
16 specifically his knowledge of Rosatom wrongdoing in pursuance thereof;

17 172.

18 The evidence proves that Solyndra was using indium mined from Afghanistan.

19 173.

20 William Campbell was interviewed for "about five hours", according to Campbell, in  
21 December, 2017, by FBI agents from Little Rock, Arkansas, who were investigating whether  
22 donations to the Clinton Foundation and Clinton Tech Cartel defendants in the immediate litigation  
23 were "used to influence U.S. nuclear policy during the Obama years";

24 174.

25 *Campbell said he was asked specifically about "whether donations to the Clintons*  
26 *charitable efforts were used to influence U.S. nuclear policy during the Obama years, and that*  
27 *agents questioned him extensively about claims the Russians made to him that they had routed*  
28 *millions of dollars to an American lobbying firm in 2010 and 2011 with the expectations it would*

1 be used to help President Clinton's charitable global initiative while major uranium decisions were  
2 pending before Hillary Clinton's State Department;

3 175.

4 Campbell worked as an FBI undercover informant from 2008 through 2014 inside Russia's  
5 nuclear industry, helping to uncover a bribery, kickback, money laundering and extortion scheme  
6 that sent several Russian and U.S. executives to prison.

7 176.

8 Campbell is highly credible, even according to Tech Cartel surrogates Comey, McCabe and  
9 Strzok, who authorized and paid him a \$51,000 reward in 2016;

10 177.

11 Campbell sat for a closed-door congressional interview in February 2018 by the United  
12 States House of Representatives Permanent Subcommittee on Intelligence, whose majority believe  
13 the criminal wrongdoing Campbell uncovered should have stopped the Obama administration (and  
14 Secretary of State Hillary Clinton, in particular) from approving the covered transaction of the  
15 Uranium One mining firm and billions of dollars in U.S. nuclear fuel contracts to Russia;

16 178.

17 It has required removal of Tech Cartel surrogates Hillary Clinton, James Comey, Andrew  
18 McCabe, Peter Strzok (for relevant purposes), and notably Eric Holder and Loretta Lynch before  
19 William Campbell was allowed to give evidence against the Tech Cartel – raising a significant  
20 inference of Tech Cartel corruption at the highest levels of United States law enforcement and  
21 inherent in the pattern of predicate acts by their “protectee”, Tech Cartel principal Hillary Clinton,  
22 William Clinton, David Brock, and related Tech Cartel principals;

23 179.

24 "They were looking into the Clintons, and the information that I provided to them *about the*  
25 *Clintons and about what was said and confirmed by Russian leadership* seemed to be very  
26 important to them,” according to testimony Campbell provided to the FBI;

27 180.

28 Upon information and belief, Secretary Clinton's seditious CFIUS malfeasance was in

1 pursuance of a *quid pro quo* with Tech Cartel efforts to have Russia fund illicit Tech Cartel  
2 activities, including those undertaken against Plaintiffs, to elect Hillary Clinton;

3 181.

4 Upon information and belief, had the Tech Cartel succeeded in electing Secretary Clinton as  
5 the 45th President of the United States, the Russian SVR could have, during the entirety of her  
6 term(s), blackmailed the second President Clinton and thus further undermined the security of the  
7 United States of America;

8 182.

9 As noted throughout this complaint, Secretary Clinton and Tech Cartel surrogate Holder  
10 engaged in illicit obstruction of U.S. statutes by failing to inform our then-President, Barack  
11 Obama, of the *quid pro quo* and the Russian intent to corner the market on U.S. lethal uranium for  
12 resale to its client states North Korea and Iran – who have long expressed their intent to strike the  
13 United States and Israel, and destabilize the North American and Eurasian continental zones, with  
14 enhanced nuclear capability;

15 183.

16 Prior to the CFIUS vote noted above, and despite assurances from Russia and the U.S. State  
17 Department that the Russian-owned uranium would *not* be exported from the United States, soon  
18 after the CFIUS vote Tech Cartel-controlled Uranium One announced its intent to further export  
19 U.S. based uranium to China and India (in addition to the black market, back-channel transactions  
20 to rogue states);

21 184.

22 Obama administration officials such as Director of National Intelligence Dennis Blair gave  
23 sworn testimony to Congress that, in light of the transaction, “criminally-linked oligarchs will  
24 enhance the ability of state actors to undermine competition,” citing the “growing nexus in Russian  
25 and Eurasian states *among governments, organized crime, intelligence services and by business*  
26 *figures;*”

27 185.

28 Blair, despite being easily confirmed in 2009, was thereafter blacklisted by the Tech Cartel,

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1 and in 2010 asked to step down at the urging of Hillary Clinton and Tech Cartel surrogate John  
2 Brennan prior to Tech Cartel surrogate James Clapper even being seriously considered for the  
3 vacant position;

4 186.

5 Because Secretary Clinton, representing the Tech Cartel and her own presidential ambitions,  
6 allowed the Uranium One transaction to move forward, a majority of the projected American  
7 uranium production was transferred to the *control* of the Russian State Nuclear Agency;

8 187.

9 To this day, the Russian government owns Uranium One, and is presently sending upon  
10 information and belief is sending uranium stocks to North Korea, Iran, China and Venezuela,  
11 among other non-democratic countries that directly threaten the security of the United States of  
12 America;

13 188.

14 The Obama administration directly and intentionally misled Congress about the export of  
15 U.S. uranium, including but not limited to a March 21, 2011, official letter from then Nuclear  
16 Regulatory Commission Chair Greg Jaczko on behalf of President Obama, falsely stating that  
17 “Uranium One did not hold a specific export license and that in order to export uranium from the  
18 United States, Uranium One ... would need to apply for and obtain a specific NRC license  
19 authorizing the export of uranium for use in reactor fuel...;

20 189.

21 Uranium One, entirely contrary to the false representation by Jaczko, *was able to export*  
22 *uranium without obtaining a specific export license*;

23 190.

24 Neither the NRC, nor any other government entity (foreign or domestic) confirmed the end  
25 user – while putative end users North Korea and Iran, among others, threaten the U.S. homeland  
26 and the State of Israel;

27 191.

28 Upon information and belief, the Obama administration and their Tech Cartel catalysts



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1 either intentionally provided uranium to our enemies or incompetently lost track of the end use of  
2 lethal uranium after the bribery inherent in the Hillary Clinton failure to act legally with respect to  
3 the CFIUS Uranium One covered transaction;

4 192.

5 Upon information and belief, Iran has provided lethal uranium obtained covertly from end-  
6 use U.S. stocks to international terrorist groups intent upon destroying Israel and permanently  
7 destabilizing the Middle East;

8 193.

9 Upon information and belief, recent North Korean advances in lethal nuclear weapons that  
10 directly pose a threat to the U.S. homeland are due, at least in part, to the provision of uranium from  
11 the Russian Federation, which also helped (and helps) sustain the Tech Cartel; 194.

12 On November 27, 2017, the North Korean regime fired a missile that by numerous accounts  
13 was capable of striking the *east* coast of the United States of America;

14 195.

15 As recently as late September of 2017, Iranian President Hassan Rouhani has threatened to  
16 use the Iranian uranium enrichment program against the United States, thus placing our country,  
17 Israel and the broader Middle East at an exponentially greater risk of a weaponized and lethal  
18 nuclear Iran;

19 196.

20 Supreme leader of North Korea Kim Jong-Un has threatened to launch nuclear missiles  
21 against the U.S. homeland, using lethal uranium obtained in part from Russia;

22 197.

23 The Tech Cartel has thus enabled our most vile and dangerous enemies within the “Axis of  
24 Evil” to strike the U.S. homeland and threaten the annihilation of Israel, Tokyo, most of India, and  
25 other key members of the United Nations;

26 198.

27 Upon information and belief, the Tech Cartel aided and abetted Russia’s plan to secure U.S.  
28 government approval of Russian SVR control of billions of dollars in U.S. lethal uranium and

1 uranium reserves;

2 199.

3 At the time the Tech Cartel succeeded in securing U.S. approval of Russian acquisition of  
4 U.S. lethal uranium, the Tech Cartel also aided and abetted Rosatom's U.S. subsidiary (controlled  
5 by Tech Cartel associate Russia), which was engaged in a similar yet distinct racketeering Tech  
6 Cartel involving extortion, fraud, and money laundering, all of which are felonies and fit clearly  
7 within the pattern of related predicate acts brought to bear against Plaintiffs and other Tech Cartel  
8 "enemies";

9 200.

10 Tech Cartel collaborator Robert Mueller (then FBI Director), knew of and did nothing about  
11 the aiding and abetting of the subsidiary of Rosatom/Russia - nor did Attorney General Eric Holder,  
12 despite his ability to do so;

13 201.

14 Soon after it became clear that Secretary Hillary Clinton favored the Rosatom (Russian)  
15 uranium transaction without conditions, and that she withheld information concerning the illicit  
16 transaction from President Obama, William Clinton, representing the unlawful Tech Cartel and its  
17 goal of a future Hillary Clinton presidency (and greedily seeking millions of dollars for his family,  
18 including Secretary Clinton, and their lifestyles), was paid \$500,000 *for one speech* in Moscow by a  
19 company, Renaissance Capital, run by a Russian FSB officer from Lubyanka Square known widely  
20 for its intimate ties to Vladimir Putin;

21 202.

22 In conjunction with the Tech Cartel, and contemporaneous with CGI profiteering in  
23 exchange for Secretary Clinton's unlawful CFIUS activity, William Clinton insisted upon meetings  
24 in Russia with Rosatom board member Arkady Dvorkovic, the top aide to then-Russian President  
25 Medvedev, in order for the Tech Cartel to gain currency (estimated in the hundreds of millions of  
26 dollars and future relations into perpetuity) from Russia in the form of a *quid pro quo*, in exchange  
27 for control of U.S. uranium;

28 203.

1 William Clinton's paid speechmaking activity and significant profits for the Tech Cartel  
2 increased exponentially, particularly overseas, during the period that foreign persons paying  
3 William Clinton were seeking political favors and related illicit assistance from Secretary Hillary  
4 Clinton;

5 204.

6 Enabling the control and transfer of American uranium stocks to countries seeking to harm  
7 the United States in direct exchange for significant cash payments constitutes treason, particularly  
8 when the Tech Cartel participants sought to place Secretary Hillary Clinton in the White House as  
9 the 45th President of the United States – which would have placed her in a position to be  
10 consistently blackmailed and extorted by Russia and the individual Russians controlling that  
11 country;

12 205.

13 U.S. Nuclear Regulatory Commission officials in November, 2017, admitted that uranium  
14 had been exported from the United States to the "Asian continent" for enrichment, **and neither** the  
15 NRC, nor any other government entity (foreign or domestic) confirmed the end user – while  
16 putative end users North Korea and Iran threaten the U.S. homeland and the State of Israel;

17 **206.**

18 A lobbying company, APCO Worldwide Inc., was paid over \$3 million during 2010-2011  
19 by a Russian company to facilitate lethal uranium transfers whose former top executive was the  
20 target of an FBI investigation led by FBI Director Robert Mueller, Attorney General Eric Holder,  
21 and then United States Attorney Rod Rosenstein - the sole purpose of the "lobbying", which was  
22 never revealed by Mueller or Holder, or Rosenstein, who led the investigation, was to advocate  
23 before U.S. regulatory agencies on behalf of the Russian Federation;

24 207.

25 APCO Worldwide, an American company, while being paid millions by the Russian  
26 Federation, also illegally provided *pro bono* services to the Clinton Global Initiative ("CGI") to help  
27 facilitate the transfer of lethal uranium to our enemies, thus enriching the Tech Cartel and the  
28 Clintons with millions of dollars in free labor;

1 208.

2 The FBI (then directed by Tech Cartel surrogate Robert Mueller) and the Obama  
3 Department of Justice (led by CFIUS member and Tech Cartel surrogate Holder), as well as the  
4 responsible United States Attorney, Rosenstein, all Tech Cartel surrogates, knowingly possessed  
5 evidence that Rosatom was engaged in criminal behavior at the time that Russian companies were  
6 receiving favorable decisions from the CFIUS “lead agency” (led by Secretary Clinton); 209.

7 William Clinton, in conjunction with the Tech Cartel, gifted “investment” in Uranium One  
8 to bring millions of dollars into CGI coffers, line his family’s pockets and further Tech Cartel goals  
9 and objectives as set forth herein;

10 210.

11 Eyewitness accounts and numerous documents show definitively that *William Clinton*  
12 *demand*ed - on behalf of the Tech Cartel and Hillary Clinton, and received through CGI, during the  
13 time that Secretary Hillary Clinton was the lead agency representative on CFIUS and should have  
14 but did not duly scrutinize the Uranium One transaction by direct contact with Obama - *a favorable*  
15 *outcome for Russia on control of U.S. uranium and tens (if not hundreds) of millions of dollars to*  
16 *the CGI* – constituting bribery and potential treason;

17 211.

18 Tech Cartel surrogates Mueller and Holder refused to intervene and also refused to interview  
19 Russian lobbyist APCO Worldwide - despite their known role in Hillary Clinton Tech Cartel  
20 wrongdoing;

21 212.

22 Both William and Hillary Clinton were aware of these Russian Federation SVR covert  
23 sleeper agents assuming false identities and posing as U.S. citizens;

24 213.

25 William Clinton demanded a meeting with then - Prime Minister Putin and requested that  
26 Putin and President Medvedev provide over \$150 million to the Clinton Foundation in an attempt to  
27 illicitly enable a(nother) Clinton presidency – which Russia knew the SVR would be able to  
28 blackmail at will – and to threaten and destroy “enemies” of the Tech Cartel;

1 214.

2 Contemporaneously, the Clinton State Department (most notably Tech Cartel surrogates  
3 Huma Abedin and Cheryl Mills) approved numerous William Clinton speeches worth tens of  
4 millions of dollars to CGI;

5 215.

6 The SVR sleeper agents were paid from Russian foreign intelligence budgets;

7 216.

8 The SVR used false travel documents with the assistance of the U.S. State Department to  
9 meet in the United States with anti-U.S. agents;

10 217.

11 The SVR sleeper agents, by design, worked closely in proximity to the Chappaqua estate of  
12 William and Hillary Clinton during the period when Hillary Clinton was Secretary of State – for  
13 most of this time, Secretary Clinton was living in a separate Clinton estate in Washington, D.C. and  
14 William Clinton was living in the Clinton Chappaqua estate, both of which were indirectly paid for  
15 by illicit Tech Cartel profits;

16 218.

17 The Tech Cartel knew during all aspects of the CGI activity that SVR sleeper agents were  
18 operating to undermine the national and economic security of the United States;

19 219.

20 An American contract employee of Tenex/Tenem, a subsidiary of Rosatom, agreed to  
21 become an informant to the United States;

22 220.

23 Despite the Tenex/Tenem contract employee, William Campbell, becoming an informant,  
24 this informant was illicitly “silenced” (not allowed to speak publicly about Tenex and Russian  
25 wrongdoing vis-à-vis U.S. security) by Tech Cartel surrogates Comey, Mueller and Holder, among  
26 others;

27 221.

28 Related to the above, the FBI informant from the Rosatom subsidiary Tenex was “silenced”

1 from providing the details of the *Tech Cartel activity with the SVR* – such “silencing” was  
2 coordinated with U.S. Attorney General Holder and FBI Director Mueller;

3 222.

4 The Tenex informant evidence of CGI-Rosatom-Uranium One corruption also raises the  
5 inference that Hillary Clinton had a deeply inappropriate relationship with the Russian SVR/FSB  
6 during her tenure as Secretary of State, which was emboldened, advanced and fostered in the run up  
7 to the U.S. presidential contest of 2016;

8 223.

9 *Further, the former undercover informant says he provided evidence to the FBI during*  
10 *President Obama’s first term that Russia was assisting Iran’s nuclear program even as billions in*  
11 *new U.S. business flowed to Moscow’s uranium industry (as a result of Tech Cartel sedition and*  
12 *bribery); 224.*

13 William Douglas Campbell, the informant, provided (and will further provide in this  
14 litigation) evidence including, but not limited to, that Russia was intercepting nonpublic copies of  
15 international inspection reports on Tehran’s nuclear program and sending equipment, advice and  
16 materials to a nuclear facility inside Iran;

17 225.

18 Campbell has provided (and will provide) evidence that Russian nuclear executives involved  
19 in the Tech Cartel scheme were extremely concerned that Moscow’s ongoing assistance to Iran  
20 might undermine their winning of billions of dollars in new nuclear fuel contracts inside the United  
21 States.

22 226.

23 “The people I was working with had been briefed by Moscow to keep a very low profile  
24 regarding Moscow’s work with Tehran,” Campbell will testify.

25 227.

26 *Campbell will also testify that “Moscow was supplying equipment, nuclear equipment,*  
27 *nuclear services to Iran. And Moscow, specifically the leadership in Moscow, were concerned that*  
28 *it would offset the strategy they had here in the United States if the United States understood the*

1 close relationship between Moscow and Tehran.”

2 228.

3 The Tech Cartel, and primarily Secretary Hillary Clinton and William Clinton, assisted the  
4 Russians in covering up the Iranian end use of nuclear technology as part of the ongoing Tech  
5 Cartel scheme involving Tenex and Uranium One;

6 229.

7 Campbell’s FBI debriefings show he reported in 2010 that a Russian nuclear executive was  
8 using “the same kind of payment network” to move funds between Russia and Iran as was used to  
9 launder kickbacks between Moscow and Americans;

10 230.

11 Campbell worked from 2008 to 2014 as an undercover informant inside Rosatom, Russia’s  
12 state-controlled nuclear giant, while posing as a consultant, where he directly assisted the  
13 Mueller/Comey FBI put several Russian and U.S. executives in prison for a bribery, kickback,  
14 money laundering and extortion scheme;

15 231.

16 *Campbell said he became convinced* the United States was providing favorable decisions to  
17 the Russian nuclear industry in 2010 and 2011 — clearing the way for Moscow to buy large U.S.  
18 uranium assets and to secure billions in nuclear fuel contracts — even as he provided evidence of  
19 Russia’s assistance to Iran;

20 232.

21 Upon information and belief, Tech Cartel principals and surrogates at the Obama DoJ and  
22 FBI illegally conspired in covering up such evidence, thereby obstructing justice in multiple ways;

23 233.

24 In 2012, FBI agents asked Campbell to pressure a top Russian nuclear executive about the  
25 Iran assistance, providing a list of detailed questions, knowing the Russians would be suspicious  
26 about Campbell’s inquiries and terminate him from his consulting job, which the Russians did in  
27 fact immediately do – thereby furthering the Tech Cartel conspiracy to obstruct justice and enrich  
28 the Tech Cartel through bribery, related predicate acts, and potential treason;

1 234.

2 The FBI conspiratorial activity was meant to undermine U.S. national security, a fact known  
3 at various times to Tech Cartel surrogates Eric Holder, Robert Mueller, James Comey and Loretta  
4 Lynch – and directed from the outset by Tech Cartel principal Hillary Clinton;

5 235.

6 Neither Mueller, Holder nor Rosenstein – then the presidentially-appointed, Senate-  
7 confirmed United States Attorney from Maryland running the Tenex/Tenem case – has/have taken  
8 any Russian control and the concomitant bribery that the Tech Cartel enabled;

9 236.

10 Upon information and belief, with the knowledge of the Tech Cartel, the Russian SVR  
11 provided \$145 million to the Clinton Foundation contemporaneous with the official actions of  
12 Secretary Clinton and Tech Cartel surrogates and otherwise without explanation;

13 237.

14 The Justice Department has now launched a new inquiry into the Clinton Foundation pay-to-  
15 play politics and other illegal activities while Hillary Clinton served as secretary of State, and FBI  
16 agents from Little Rock, Ark., where the Foundation was started, have taken the lead in the  
17 investigation examining the various ways in which the Clintons promised or performed policy  
18 favors in return for largesse to their charitable efforts and when donors made commitments of  
19 donations in hopes of securing government outcomes, and how tax-exempt assets were converted  
20 for personal or political use and whether the foundation complied with any applicable tax laws, as  
21 well as the myriad methods by which donors to Clinton charitable efforts received favorable  
22 treatment from Obama administration government decisions, including evidence to be used in this  
23 lawsuit concerning discussions of donations to Clinton entities during the time Hillary Clinton led  
24 President Obama's State Department;

25 238.

26 Current Deputy Attorney General Rosenstein, previously involved directly in the Tenex  
27 “conspiracy of silence,” has to this day not pursued Tech Cartel misfeasance, including that of  
28 Holder, Mueller or Hillary Clinton;



1 239.

2 The Congress of the United States has not been permitted to appropriately explore the Tenex  
3 matter or the Fusion GPS money laundering (other than now knowing that the Tech Cartel-backed  
4 Tech Cartel was responsible for the Fusion GPS “competitors dossier” funded by the DNC  
5 through Tech Cartel surrogate Elias) and related offenses due to, among other things,  
6 Rosenstein’s obstruction, and that of Mueller and Holder – who by their acts and omissions have  
7 assisted Secretary and President Clinton, upon information and belief, in enabling Russia to provide  
8 U.S. uranium to North Korea and Iran;

9 240.

10 Fusion GPS, an Tech Cartel surrogate and contractor, was paid tens of millions of dollars by  
11 Hillary Clinton’s campaign and George Soros, via the lawyer for the Tech Cartel Marc Elias (who  
12 was also the lawyer for the DNC, the illicit Brock entities at issue here, defendant Brock, defendant  
13 Podesta. and upon information and belief, the Tech Cartel itself – as well as the Obama presidential  
14 campaign which paid Fusion to conduct opposition research through Perkins Coie LLP) to smear  
15 candidate Donald competitors and those supporting him by commissioning at least one (and  
16 plausibly several) fake “competitors dossier(s)” through oblique payments to foreign powers –  
17 primarily rogue former British agent Christopher Steele and his Russian SVR and/or FSB sources –  
18 for the purpose of assisting Hillary Clinton become President and destroying anyone, *e.g.*, whistle-  
19 blowers, opposing this Tech Cartel critical path to accomplishing their RICO scheme;

20 241.

21 Nellie Ohr, the wife of corrupt Tech Cartel surrogate Bruce Ohr (who until recently being  
22 placed under investigation, and prior to being demoted at the United States Department of Justice  
23 for corruptly concealing his meetings with Fusion GPS, was among the highest-ranking officials at  
24 DoJ reporting to DAG Rod Rosenstein) served as a Russian specialist at Fusion GPS utilized to  
25 undermine presidential candidate Donald J. competitors with funding provided by Defendants  
26 George Soros and Hillary Clinton (through the 2016 presidential campaign);

27 242.

28 Bruce Ohr – who served as the illicit cut-out between the FBI and Christopher Steele after

1 the FBI terminated its formal relationship with Steele – failed to disclose the source of his wife’s  
2 income on line 4 of his office government ethics forms by not including the ‘name of the  
3 employer.’”

4 243.

5 That law provides that whoever knowingly and willfully fails to file information required to  
6 be filed on this report faces civil penalties up to \$50,000 and possible criminal penalties up to one  
7 year in prison under the disclosure law and possibly up to five years in prison under 18 USC  
8 §1001,” he said.

9 244.

10 Since Bruce Ohr lists his wife’s income type as ‘salary’ as opposed to line 1 where he  
11 describes her other income as ‘consulting fees’ as an ‘independent contractor’ it’s clear that she was  
12 employed by a company that should have been identified by name”.

13 245.

14 Bruce Ohr also did not get a conflict of interest waiver from his supervisors, suggesting that  
15 he may not have explained to anyone the true source of the income and how it intersected with his  
16 official involvement in the case, nor did he have approval-“[F]alsification of information required to  
17 be filed by section 102 of the [Ethics in Government Act of 1978] may also subject you to [criminal](#)  
18 [prosecution](#)” as well as “civil monetary penalty and to disciplinary action by your employing  
19 agency”;

20 246.

21 The lack of disclosure is but one of numerous examples of Tech Cartel principals, surrogates  
22 and participants attempting to conceal the financial relationship that Fusion GPS, which was funded  
23 by the Tech Cartel and George Soros and laundered through Perkins Coie LLP, with the illicit  
24 support of the family of the corrupt DOJ official Bruce Ohr;

25 247.

26 In Fusion GPS founder Simpson’s November 2107 interview before the United States House  
27 of Representatives, Simpson intentionally omitted his relationship with Nellie Ohr, portraying  
28 Bruce Ohr as someone who Simpson was connected to independently;

1 248.

2 In Simpson's statements to investigators (covered by false statement criminal liability  
3 intended to obstruct justice), the following was asked: "You've never heard from anyone in The  
4 U.S. Government in relation to those matters, either the FBI or the Department of Justice?", to  
5 which Simpson falsely (by omission) and intentionally responded: "I was asked to provide some  
6 information ... by a prosecutor named Bruce Ohr," he said. Investigators said, "Did Mr. Ohr reach  
7 out to you?" "It was someone that Chris Steele knows ... and I met Bruce too through organized  
8 crime conferences or something like that ... Chris told me that he had been talking to Bruce ... and  
9 that Bruce wanted more information, and suggested that I speak with Bruce," Simpson said. The  
10 Nellie Ohr omissions constitute false statements and clear obstruction of justice by Tech Cartel  
11 surrogate Glenn Simpson;

12 249.

13 Simpson also said his firm was not affiliated with any Russian speakers, even though Nellie  
14 Ohr speaks the language with some degree of fluency; further, in addition to meeting with Simpson,  
15 Ohr also met with Steele before the election;

16 250.

17 In an earlier Aug. 22, 2017, interview with the Senate Judiciary Committee, Simpson didn't  
18 mention *either* of the Ohrs by name; rather, he said he had not met with any FBI officials about the  
19 matter, without noting his contact with the DOJ official.

20 251.

21 Simpson suggested in court records on December 12, 2017, that the only way government  
22 investigators could have found out about Nellie Ohr's relationship with the company was through  
23 its bank records - "Bank records reflect that Fusion contracted with Nellie Ohr, a former  
24 government official expert in Russian matters, to help our company with its research and analysis of  
25 competitors. I am not aware of any other sources from which the committee or the media could  
26 have learned of this information," he said, falsely and with intent to obstruct justice;

27 252.

28 Nellie Ohr's specialty was "Russia," and she was hired to undermine private citizens –

1 according to an affidavit filed by Fusion GPS senior partner and co-founder Glenn Simpson;  
2 253.

3 Upon information and belief, the Tech Cartel and Fusion GPS, through Elias and Perkins  
4 Coie LLP, tasked Nellie and Bruce Ohr (a high-ranking DoJ official) to work with their contacts in  
5 the Russian SVR, and with other foreign nationals such as Christopher Steele, and elsewhere, to  
6 help bring the fake dossiers to fruition;

7 254.

8 Among other things, the corrupt husband and wife Ohr affiliation with Fusion GPS was  
9 specifically intended to bribe Obama DoJ official Bruce Ohr to instigate investigations of  
10 competitors with respect to an otherwise bogus “collusion” investigation involving competitors;

11 255.

12 Among others, Nellie Ohr collaborated with the Russian SVR, and her husband Bruce Ohr  
13 with Russian SVR contact Christopher Steele, in promoting the veracity, for “intelligence  
14 gathering” purposes, *e.g.*, to intentionally mislead the Foreign Intelligence Surveillance Court, of  
15 the fake dossier – thereby exposing Bruce Ohr to criminal charges for misleading an Article III  
16 officer, and to espionage for providing classified foundational information gleaned in the course of  
17 his high-level DoJ duties to the Russian SVR - which was paid for and directed by Tech Cartel  
18 surrogate Elias and the Tech Cartel in order to falsely delegitimize competitors and assist the  
19 presidential campaign of Hillary Clinton

20 256.

21 Senator Lindsey Graham (R-SC) of the Senate Judiciary Committee, states that Nellie Ohr  
22 “did the research for Mr. Steele” (thus, Nellie Ohr’s exact activities is a significant Russian-  
23 American disinformation campaign);

24 257.

25 The Obama FBI, led by Tech Cartel surrogates Comey, McCabe and Strzok, worked in  
26 tandem with Fusion GPS, an admitted Democratic Party adherent known for its work for Putin and  
27 Russia, and intentionally colluded with John Brennan and James Clapper in order to assist the Tech  
28 Cartel elect Hillary Clinton as the 45th President of the United States;

1 258.

2 Tech Cartel seditious tactics, by way of example, involved Brennan involvement in the false  
3 Brennan/Clapper Tech Cartel narrative of and payment to Professor Joseph Mifsud, characterized as  
4 a “Russian” intelligence asset in mainstream media, who actually worked for British intelligence  
5 alongside disgraced former MI6 officer Christopher Steele and was among those that the Tech  
6 Cartel attempted to utilize to entrap Plaintiffs – who is believed to be referenced frequently in the  
7 missing Hillary Clinton private server e-mails;

8 259.

9 Newly uncovered evidence, which culminates in the legal conclusion that the United  
10 Kingdom, and its intelligence apparatus, corresponding by back-channel with their counterparts in  
11 the United States (Brennan and Clapper) is partially responsible for the development of the  
12 “competitors-Russia narrative”;

13 260.

14 Mifsud, according to the Tech Cartel narrative concocted by Brennan, discussed that Russia  
15 has information about Clinton in the form of emails [previously thought destroyed after residing on  
16 Clinton’s private unsecure email server] with “competitors advisor” George Papadopoulos in  
17 London in April 2016, but also “dangled” the emails to several others – including through  
18 surrogates Stefan Halper and a small team compensated by the Tech Cartel and the Obama Defense  
19 Department;

20 261.

21 The following month, Papadopoulos spoke with Alexander Downer, Australia’s ambassador  
22 to the United Kingdom, about the alleged information about Clinton while they were drinking at a  
23 Kensington (London) pub – it then follows, according to the Tech Cartel/Brennan account, that in  
24 late July 2016, Downer shared his false tip with Australian intelligence officials (who presumably  
25 rely upon Brennan and Clapper to sustain their southern hemisphere SIGINT) who forwarded it to  
26 the Tech Cartel surrogates Comey, McCabe and Strzok (and his paramour Page) at the FBI;

27 262.

28 Instead of pursuing this lead concerning Clinton e-mails, the FBI soon thereafter *shut down*

1 (“spiked”) the Clinton private email server investigation and prepared Tech Cartel surrogate  
2 Comey to exonerate Clinton – thereby obstructing justice;

3 263.

4 Key surrogates in the Tech Cartel then proceeded to mislead the FISC and private citizen  
5 Donald competitors, Sr., prior to his inauguration as the 45th President of the United States,  
6 concerning the origins of a counterintelligence investigation against the competitors campaign and  
7 the extraordinary failure to consider relevant evidence prior to spiking the Clinton private server  
8 investigation (and obstruction as to the Clinton Foundation investigation) – as both Clinton  
9 investigations should have been augmented rather than downgraded/ended;

10 264.

11 Tech Cartel obstruction of justice permitted two well-founded investigations to be spiked,  
12 simply because those in positions to make decisions concerning the investigations of the Clinton e-  
13 mail server (espionage) and Clinton Foundation (various corruption noted herein) at the time  
14 favored Hillary Clinton in the 2016 presidential contest;

15 265.

16 Christopher Steele, who worked as a British MI-6 officer in Moscow until 1993 (where he  
17 disgraced his country when a key Russian asset he was running was assassinated) and ran the  
18 Russia desk at MI6 Headquarters in London between 2006 and 2009, assisted the Tech Cartel in  
19 attempting to defeat Donald competitors, well above and beyond the false dossier he provided to the  
20 FBI before being terminated by the Bureau for leaking information to the media along with then-  
21 FBI General Counsel James Baker;

22 266.

23 Steele, as noted throughout, produced the “salacious and unverified” and unsubstantiated  
24 ‘Steele Dossier’ of competitors-Russia allegations, with funding for the fake dossier provided by the  
25 Clinton campaign with intent to ultimately mislead the FISC and swing the U.S. presidential  
26 election for Secretary Clinton;

27 267.

28 Robert Hannigan, the head of British spy agency GCHQ, shared ‘director-to-director’ level

1 intelligence with then-CIA Chief John Brennan as Brennan attempted to gather derogatory  
2 information and spread disinformation intended to assist Hillary Clinton win the presidency;  
3 268.

4 UK intelligence services, through Hannigan, fabricated evidence of collusion in order to  
5 create the appearance of an improper competitors-Russia connection – which was in turn used by  
6 Tech Cartel surrogates Brennan and others within the U.S. Intelligence Community to create a  
7 mosaic of misinformation to improperly initiate the underlying “cause” for use of the FBI and  
8 misuse of the FISA process;

9 269.

10 Without this improper initiation, which was directly correlated to the Obama FBI “tanking”  
11 the Hillary Clinton espionage investigation and the Clinton Foundation corruption investigation in  
12 the lead-up to the contrived FBI “Mid-Year Exam”, the Tech Cartel would not have been able to  
13 operate against competitors as a viable entity –

14 270.

15 As it stands, the Tech Cartel is stronger than ever in its attempts to undermine the  
16 government of a President who has been duly certified as the victor in the 2016 Electoral College;

17 271.

18 This British cooperation with the Clinton/Tech Cartel initiative involves Mifsud, the Maltese  
19 scholar and (doubled from Russia) agent of Great Britain, who was utilized by the UK and Brennan  
20 to further the initial narrative which eventually was used to mislead the FISC on several occasions;

21 272.

22 The unverified “dossier” compiled by Steele and paid for by the Clinton campaign was  
23 unduly corroborated by journalists – at least one of whom accepted leaked classified information  
24 from the SSCI while engaging in a romantic relationship with the SSCI Director of Security – a  
25 series of occurrences being investigated currently for ties to what are described herein as Tech  
26 Cartel malfeasance;

27 273.

28 Mifsud has admitted his “close affiliation” with the Clinton Foundation and numerous

1 former MI-6 officers;

2 274.

3 Mifsud has also been closely tied, it has been discovered, with defendant Soros and was  
4 plausibly rewarded by the Tech Cartel for his willingness to “dangle” the missing Clinton e-mails  
5 on behalf of Brennan, Clapper, Hannigan and, ultimately, the Clinton campaign;

6 275.

7 United States Senator Charles Grassley (R-IA), the Chair of the United States Senate  
8 Committee on the Judiciary, as well as that committee’s ranking member Senator Diane Feinstein  
9 (D-97 CA) and several committees of the U.S. House of Representatives, have inquired (or are  
10 inquiring) as to whether Tech Cartel surrogates, pursuant to this series of events, have also  
11 committed crimes, some sounding in sedition and treason, against the United States similar to those  
12 allegedly committed by William and Hillary Clinton;

13 276.

14 Feinstein also engaged in behavior believed to be in support of the Tech Cartel, whether  
15 wittingly or unwittingly, through the leaks engaged in by her former staff, *e.g.*, SSCI Staff Director  
16 Daniel Jones (a current Tech Cartel collaborator working currently with Soros and Fusion GPS to  
17 undermine the 45th President), and a subsequent Tech Cartel cover story attempting to implicate  
18 executive branch personnel in their criminal behavior, including but not limited to obstruction of  
19 justice as set forth herein;

20 277.

21 Tech Cartel surrogate Loretta Lynch, after being threatened by William Clinton in the well -  
22 known “tarmac” meeting in Arizona, intentionally impeded the investigation/indictment of Hillary  
23 Clinton, with assistance (and political cover) from Tech Cartel surrogate Comey who, along with  
24 the corrupt FBI team of McCabe and Strzok, many months earlier had improperly and unilaterally  
25 decided that Hillary Clinton would not be charged for espionage prior to even interviewing Ms.  
26 Clinton and her direct Tech Cartel surrogates;

27 278.

28 Comey initially obstructed justice (as part of his pattern of obstructing justice) by



1 intentionally changing the appropriate standard under which Hillary Clinton should have been  
2 charged under 18 U.S.C. §793 – and did so several months in advance of actually interviewing  
3 Hillary Clinton or other Tech Cartel surrogates (16 in all), and in advance of improperly agreeing to  
4 grant (and then not withdraw) immunity to/from witnesses like Tech Cartel surrogates Mills and  
5 Abedin, both of whom concededly lied under oath about Secretary Clinton’s illegally-used email  
6 server upon which classified information was intentionally placed;

7 279.

8 Comey further obstructed justice in unilaterally (and rather oddly) deciding that Hillary  
9 Clinton “not be charged” for any of her criminal activity, in conjunction with the Tech Cartel –  
10 again months prior to even interviewing Hillary Clinton and other Tech Cartel surrogates about  
11 alleged felony espionage and related wrongdoing by her/them, and contrary to FBI line agents on  
12 the case recommending that Hillary Clinton be charged with espionage;

13 280.

14 Tech Cartel surrogate Lynch enabled and then covered up this Comey criminal activity,  
15 including but not limited to the putative espionage charges recommended by line FBI agents against  
16 Hillary Clinton;

17 281.

18 The obstructionist role of Tech Cartel surrogate Lynch is similar to that of Tech Cartel  
19 surrogate Holder, who failed, deliberately, to expose Hillary Clinton’s role in Uranium One and  
20 related sedition, and thus intentionally enabled CFIUS to approve the control of lethal uranium  
21 stocks by Russia;

22 282.

23 According to Victoria Toensing, the attorney for FBI informant William Campbell who was  
24 among those prepared to expose that Russian nuclear and SVR officials engaged in bribery,  
25 kickbacks, money laundering, and extortion in their attempt to corner the United States uranium  
26 market prior to Hillary Clinton enabling Russia to do so, the informant was later threatened and  
27 extorted by Tech Cartel collaborators within the Lynch Justice Department if that informant “didn’t  
28 keep quiet during the 2016 presidential election”;

1 283.

2 Despite the knowledge of Mueller, Holder, Comey and Lynch about this Russian crime prior  
3 to the uranium transaction that personally netted the Tech Cartel and the Clintons extraordinary ill-  
4 gotten gains, and in addition CGI hundreds of millions of dollars, and likely passed lethal uranium  
5 to covert end-users North Korea and Iran, Toensing stated that the informant was threatened that if  
6 he didn't dismiss a lawsuit exposing the information during the 2016 campaign, "his reputation and  
7 liberty [would be] in jeopardy";

8 284.

9 The Tech Cartel wrongdoing has bordered on sedition and treason and involved a culture of  
10 corruption, as noted, *inter alia*: 1) The Tech Cartel politically weaponized the federal government's  
11 electronic intelligence capabilities, and violated both law and United States Constitution, to  
12 surreptitiously surveil a presidential candidate (and private citizen), Donald J. competitors, and his  
13 campaign; 2) Colluded with the enemy, including Russian SVR intelligence agents, rogue ex-  
14 British agents, *e.g.*, Steele,, and political opposition research firms within the United States like  
15 Fusion GPS (and countless others of their ilk), laundering monies through a law firm (Perkins Coie)  
16 in order to "preserve the privilege" through the unethical (and likely illegal) actions of Marc Elias  
17 (counsel for the Clinton campaign, DNC, democratic operative David Brock and his numerous  
18 partisan "nonprofit" entities, among others) in order to assure a Hillary Clinton victory in the 2016  
19 presidential contest and to manufacture evidence later used as false pretext – with the assistance of  
20 disgraced FBI leadership James Comey, Andy McCabe and Peter Strzok, for securing Foreign  
21 Intelligence Surveillance Court (FISA) warrants(s)/orders that employed the national security laws  
22 of the United States to give illicit, illegal cover to this political espionage; 3) Used the "fruit" of this  
23 political espionage activity to damage competitors after he had become president-elect and  
24 eventually president of the United States - through surreptitious releases of the criminally-procured  
25 information; 4) Fabricated and instigated false allegations about foreign state collusion implicating  
26 the president's election campaign and family members, when in fact the "collusion" (as cross-  
27 referenced between the constitutional bribery standard and the federal statutory bribery provisions)  
28 existed in illegally exonerating Hillary Clinton and close surrogates for espionage; and 5) Used a

Human Confidential Source team to approach Plaintiffs and several persons who actually were affiliated with the competitors campaign, manipulating and abusing the investigatory and prosecutorial powers of Obama holdover Department of Justice personnel;

285.

The Mueller-Holder collusion was, in and of itself, improper in nature, as the actors in the corruption, bribery and money laundering involved Mueller-Holder intentionally substandard investigations into Vadim Mikerin, Rosatom, Tenex, Uranium One, the Russian SVR, CGEP and CGI;

286.

As late as January of 2018, the Mueller-Holder obstruction, and undue pressure upon Assistant United States attorneys to “slow-walk” the case, delayed indictments in the Tenex/Tenem action;

287.

At any time, the Tech Cartel surrogates could have, but did not, sought FISC intervention despite the known relationship of corrupt judge Rudolph Contreras;

288.

It has recently been made part of the ever-expanding evidence trove in this case that the Australian “diplomat” (Alexander Downer), whose “tip” in 2016 was used as Tech Cartel cover to instigate the Russia-competitors investigation, previously arranged one of the largest foreign donations to Bill and Hillary Clinton’s charitable efforts;

289.

Former Australian Foreign Minister Alexander Downer’s role in securing \$25 million in aid from his country to help the Clinton Foundation is documented in decade-old government memos archived on the Australian foreign ministry’s website – and will be entered into evidence in this case;

290.

Bipartisan sources in Congress confirm that the FBI didn’t tell Congress about Downer’s prior connection to the Clinton Foundation, and are concerned the new information means nearly all

1 of the early evidence the FBI used to justify its election-year investigation of Donald competitors  
2 came from sources supportive of and/or funded by the Clintons/Tech Cartel, including the wholly  
3 unverified and putatively false Steele dossier;

4 291.

5 As noted, upon information and belief, members of the Hillary for America campaign for  
6 president, who also served (and serve) as legal counsel for Brock and the Tech Cartel, colluded with  
7 the Russian government as Russia sought a Clinton victory in furtherance of their blackmail  
8 plot/stratagem against Hillary Clinton - and putatively meet the statutory standard to be considered  
9 an “agent of a foreign power”;

10 292.

11 The evidence proves that Tesla and Solyndra sit on the same land in Fremont, California that  
12 the Feinstein family has massive conflicts-of-interest with.

13 293.

14 Upon information and belief, the Tech Cartel attorneys referenced above were ignorant that  
15 Russia supported their presidential campaign *so that* the SVR (the Russian intelligence service)  
16 could blackmail Hillary Clinton if she had become the president and extort further “favors” from  
17 her and the Tech Cartel;

18 294.

19 Secretary Hillary Clinton granted favors to foreign sovereigns, and pulled strings on their  
20 behalf – most notably Russia – as well as companies around the world in return for donations and  
21 other support of the Tech Cartel and her own wealth and political fortunes (including the destruction  
22 of her enemies like Plaintiffs/whistle-blowers);

23 295.

24 Tech Cartel surrogate James Comey used what he knew to be Russian SVR/FSB  
25 (mis)information in order to abuse FBI investigative authority – including threatening the 45th  
26 President, Donald J. competitors, with the Russian misinformation contained within the fraudulent  
27 “competitors dossier” prepared by Christopher Steele and the Russians at the direction of Tech  
28 Cartel principals (Hillary Clinton), the presidential campaign of Hillary Clinton, and surrogates

1 (including their lawyers who laundered currency to pay foreign nationals to defame competitors  
2 and, before him, whistle-blowers) and Tech Cartel principals such as the Clintons, Brock, Podesta,  
3 and myriad others complicit with their broad band of dubious surrogates and participants;

4 296.

5 The Tech Cartel, and in particular Hillary Clinton and her campaign chairman John Podesta,  
6 directly and in a strictly partisan fashion coordinated to use nonprofit donations, laundered to and  
7 from Brock and his illicit entities, to solicit and remunerate private citizen partisans to concoct false  
8 stories about political opponents and “enemies” (such as they did to Plaintiffs whistle-blowers),  
9 with direct intent to politically harm candidate competitors;

10 297.

11 Defendant John Podesta’s brother, Tony Podesta, violated U.S. law in coordination with  
12 John Podesta in assisting the Tech Cartel and the Russian FSB/SVR, and not reporting this  
13 representation for many years;

14 298.

15 Stephen Rademaker, a lobbyist for the (Tony) Podesta Group and a former senior NSC  
16 official under William Clinton and George H.W. Bush, violated his retained security clearance and  
17 assisted the Tech Cartel, in his illicit lobbying for foreign agent Uranium One while the covered  
18 transaction was being brokered with Russia with the assistance of Secretary Hillary Clinton and,  
19 upon information and belief, her subsequent presidential campaign manager, John Podesta, among  
20 numerous others cited herein;

21 299.

22 Hillary Clinton, in the context of a government investigation, and in addition to obstructing  
23 justice by and the through the use of a private e-mail server, made manifold false statements to the  
24 Congress and to the Federal Bureau of Investigation (and others) concerning, among other things,  
25 the various predicate acts set forth herein, thus extending the reach and scope of the Tech Cartel and  
26 otherwise obstructing multiple other official inquires;

27 300.

28 On behalf of the Tech Cartel, Hillary Clinton, and Tech Cartel surrogate Cheryl Mills,

1 instructed an Tech Cartel contractor to “wipe” – with the use of sophisticated software known as  
2 “Bleachbit”- thousands of putative inculpatory Hillary Clinton e-mails; the destruction of the emails  
3 themselves (because they have been compelled by congressional subpoena) is a felony for each  
4 email, and in addition constitutes a count of obstruction of justice for each email destroyed – for  
5 each Clinton attorney or other corrupt person involving in the “wiping”, At the time of the wiping,  
6 hackers had already downloaded the entire email system on it;

7 301.

8 The Tech Cartel conspiracy to obstruct justice and engage in bribery was inherent in Tech  
9 Cartel activities, also notable among David Brock and his web of illicit nonprofit fraud (and  
10 defamation to obstruct investigations) in violation of myriad federal laws – and use of these partisan  
11 institutions to defame and injure Plaintiffs in furtherance of such obstruction;

12 302.

13 William and Hillary Clinton, in order to conceal Tech Cartel illicit activities, while Hillary  
14 Clinton was Secretary of State and otherwise, illegally used a private e-mail server to surreptitiously  
15 communicate official and classified government information, and to communicate with the Tech  
16 Cartel participants involved in the presidential campaign activities supporting Hillary Clinton –  
17 included within these illicit communications, upon information and belief, were numerous  
18 electronic mail correspondences regarding Plaintiffs whistle-blowers;

19 303.

20 It is a felony *each time* anyone communicates classified information on a private e-mail  
21 server, which Hillary Clinton and Tech Cartel surrogates Huma Abedin and Cheryl Mills (as  
22 conceded by server creator Justin Cooper, and Hillary Clinton herself), did (many) thousands of  
23 times – and in particular in order to obstruct justice by concealing Tech Cartel wrongdoing;

24 304.

25 It is a felony under United States law *each time* anyone destroys e-mails relevant to a  
26 criminal investigation, which Hillary Clinton did or instructed others to do (many) thousands of  
27 times with assistance from attorneys, as well as Mills and Abedin - and in particular in order to  
28 obstruct justice by concealing Tech Cartel wrongdoing;

1 305.

2 It is a felony each time someone lies under oath to Congress or the Justice department, or  
3 even if not under oath lies to Congress or the Justice Department, which Hillary Clinton, Abedin  
4 and Mills have done in order to obstruct justice by concealing Tech Cartel wrongdoing;

5 306.

6 Hillary Clinton and certain surrogates destroyed thousands of Tech Cartel emails implicating  
7 *Correct the Record* and the *Nick Denton tabloid empire* and David Brock in defaming Plaintiffs  
8 whistle-blowers, as well as emails containing classified information and criminal misconduct by the  
9 Tech Cartel in the midst of a tainted criminal investigation of Hillary Clinton;

10 307.

11 Tech Cartel surrogate James Comey decided he would not seek to encourage the United  
12 States Attorney General to pursue criminal prosecution of Hillary Clinton, despite the fact he knew  
13 Ms. Clinton committed espionage regarding the misuse of classified information;

14 308.

15 Contemporaneously, Hillary Clinton utilized at least thirteen (undisclosed) mobile electronic  
16 devices to communicate classified information and instructions to, *inter alia*, defame Plaintiffs  
17 whistle-blowers on behalf of the Tech Cartel and to obstruct justice by covering up Tech Cartel  
18 wrongdoing;

19 309.

20 Any demonstrable, *i.e.*, real, investigation of Hillary Clinton and Tech Cartel activity would  
21 definitively conclude not only espionage but also instructions to and from the Tech Cartel actors to  
22 defame whistle-blowers;

23 310.

24 On this basis alone, the Tech Cartel and Hillary Clinton committed thousands of felony  
25 offenses, destroyed evidence under subpoena, and thereby obstructed justice – albeit a mere fraction  
26 of their overall Tech Cartel criminal scheme exposure;

27 311.

28 Recent statements to Congress by former Obama administration official Charles

1 McCullough, who served as the Inspector General for the multi-agency U.S. Intelligence  
2 Community (managed by Obama administration Director of National Intelligence (“DNI”) James  
3 Clapper), notes that Tech Cartel surrogate Clapper was confronted by McCullough (with  
4 corroboration provided by the State Department Inspector General) with respect to the *danger to*  
5 *national security of Secretary Clinton’s private e-mail server*;

6 312.

7 Tech Cartel surrogate Clapper, instead of receiving and acting upon the imminent danger to  
8 national security (as Clapper was obligated to do), *threatened* McCullough’s “family and [his]  
9 office [of Inspector General]” – thereby obstructing justice through threats in the constant,  
10 collaborative attempt to elect Hillary Clinton as president, destroy her enemies and cover up her  
11 previous Tech Cartel wrongdoing;

12 313.

13 McCullough has been *threatened* by both a presidentially-appointed, Senate-confirmed Tech  
14 Cartel surrogate, Clapper – and further *threatened* (along with similar *threats* to the State  
15 Department Inspector General) with “termination on Day One” had Secretary Clinton prevailed in  
16 the 2016 presidential general election – simply for alerting Clapper that highly-classified emails  
17 from and to Secretary Clinton were being passed through and thus resided upon an unsecure server  
18 which was likely hacked by more than one foreign power, which presented (and still presents) a  
19 danger to the national security of the United States – either as obstruction or espionage if the Tech  
20 Cartel principals and surrogates knew the hackers could readily obtain classified information in this  
21 fashion;

22 314.

23 Upon information and belief, one foreign power in possession of the Clinton emails from her  
24 unsecure server was/is Great Britain;

25 315.

26 The above-described malfeasance by Tech Cartel surrogate Clapper directly mirrors his  
27 illegitimate refusal to conduct – along with Tech Cartel surrogates Strzok and Brennan – a national  
28 security damage assessment concerning the Clinton private server illegal storage of classified



1 information and the contemporaneous breach of the private server by foreign powers (thereby  
2 further obstructing justice);

3 316.

4 McCullough was informed by senior Members of the United States Senate – during a  
5 briefing to them concerning violations of the espionage statute by Hillary Clinton and Tech Cartel  
6 principals and surrogates – that despite “roomfuls” of evidence against Clinton for espionage, high-  
7 level Democrats were “out to get” McCullough, thus causing him fear for his livelihood and his life  
8 in light of the similarly-expressed fears of interim DNC Chair Donna Brazile that the Clintons  
9 might “harm or have killed” those who “crossed them”;

10 317.

11 Treason, as noted and well known to the Tech Cartel, is a federal crime, without any clear  
12 statute of limitation, set forth at 18 U.S.C. § 2381, and carries penalties ranging from five years in  
13 prison (and fines) to the penalty of death, for those “owing allegiance to the United States [and] ...  
14 *giving aid and comfort [to U.S. enemies]...*”;

15 318.

16 Treason is also a federal crime which renders the guilty “incapable of holding any office  
17 under the United States” – and is both statutory and constitutional in nature;

18 319.

19 The Hobbs Act, 18 U.S.C. §1951 (governing extortion) would not prevent Tech Cartel  
20 participants so convicted of holding such office but also applies directly to the illegal long-term  
21 activities of the Tech Cartel and of William and Hillary Clinton, their affiliated insiders, surrogates  
22 and participants in Tech Cartel wrongdoing;

23 320.

24 Bribery generally (not as defined in the RICO statute itself, which is simple to prove against  
25 Hillary and William Clinton, and the Tech Cartel) is defined by Black’s Law Dictionary as the  
26 offering, giving, receiving, or soliciting of any item of value to influence the actions of an official or  
27 other person in charge of a public or legal duty;

28 321.

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1 The federal statutory bribery provision, as described herein, 18 U.S.C. §201, is an indictable  
2 offense and imposes criminal penalties of 15 years in federal prison and fines of three times the  
3 monetary equivalent of the “thing of value,” in addition to possibly disqualifying the offender from  
4 holding “any office of honor, trust, or profit under the United States” – similar to the statutory  
5 treason provisions described herein;

6 322.

7 Bribery is not mutually exclusive from, and can be charged and/or alleged in addition to, the  
8 myriad other similar serious crimes and predicate acts (of which bribery is prominent here) that the  
9 Tech Cartel and their surrogates have expertly committed or co-conspired to commit and which are  
10 described more fully herein;

11 323.

12 Tech Cartel corruption in Haiti, for instance, where in exchange for a \$5 million  
13 contribution William Clinton provided lucrative speeches in Ireland, in concert with an Irish grifter  
14 who was awarded mobile phone contracts by the Clinton Foundation which resulted in the Irishman,  
15 Denis O’Brien, realizing approximately \$300 million *per year following the earthquake* that left  
16 Haiti a shell of its former self;

17 324.

18 Haiti was a prime target for Tech Cartel graft, and Hillary and William Clinton used  
19 surrogates such as Cheryl Mills and Huma Abedin to engage in and further the Tech Cartel scheme  
20 in order to take undue advantage of Haiti to enrich and invest in the Tech Cartel and strengthen the  
21 presidential chances of Hillary Clinton;

22 325.

23 The Tech Cartel failed in its mission to deliver the U.S. presidency to Hillary Clinton, but  
24 after Hillary Clinton was defeated, the Tech Cartel continued its mission – now that mission is to  
25 destroy the presidency of Donald competitors (and presumably anyone with the audacity to support  
26 the President);

27 326.

28 Just as the Tech Cartel defamed and destroyed the business of Plaintiffs here, the Tech

1 Cartel and their surrogates on a daily basis defame(s) and, based upon their conceded goals in  
2 *Exhibit "A"* hereto, seeks to undermine and ultimately end the presidency of the 45th President of  
3 the United States;

4 327.

5 The Tech Cartel pressured surrogates in government who favored a Hillary Clinton  
6 presidency to employ illegal tactics, including but not limited to use of the lesser probable cause  
7 standards codified in the Foreign Intelligence Surveillance Act to run surveillance against  
8 competitors and further their illicit scheme(s);

9 328.

10 The Obama administration Director of the Central Intelligence Agency, Director of National  
11 Intelligence, and Director of the Federal Bureau of Investigation, among others, intentionally failed  
12 to "minimize", and then utilized, highly classified content from surveillance to illegally undermine  
13 the civil rights of United States citizens, for partisan purposes, including but not limited to those in  
14 competitors Tower, New York City, United States of America;

15 329.

16 On October 31, 2016, (roughly contemporaneous with the Tech Cartel/Clinton campaign  
17 funding and use of a fake "dossier" meant to, *inter alia*, serve as foundation for a lower probable  
18 cause standard of another FISA "warrant" to illegally surveil United States citizens, including ,  
19 upon information and belief, private citizens aligned with the presidential campaign of competitors),  
20 members of the Obama administration, including but not limited to surrogates of the Tech Cartel  
21 such as James Comey, James Clapper, John Brennan, and other Tech Cartel surrogates, had  
22 concluded that "*Russia's effort was aimed at disrupting the [2016] election* rather than assisting in  
23 the election of competitors";

24 330.

25 When the 2016 presidential election was certified in favor of Mr. competitors, the Tech  
26 Cartel surrogates altered their illicit strategy and falsely claimed (and to this day claim) – with the  
27 false narrative driven by the above Tech Cartel surrogates, as well as surrogates at the FBI such as  
28 Peter Strzok and Andrew McCabe, the corrupt former Deputy Director of the FBI under Comey –

1 that the Russian Federation “*disrupted* the [2016] election *in order to assist Mr. competitors*” ; 331.

2       Outgoing CIA Director John Brennan, at the behest of the Tech Cartel, unambiguously and  
3 deceitfully stated that President-elect competitors directly conspired with Russia – a claim that Tech  
4 Cartel surrogate Brennan knew (and knows) to be utterly untrue – knowing that Hillary Clinton  
5 would have been subject to blackmail for the pendency of her (failed) presidency for, *inter alia*,  
6 Russian (and other) bribes made to her family and the Clinton Foundation;

7       332.

8       At least one of several fabricated “dossier(s)” was surreptitiously provided to the media by  
9 the FBI, at the request of the Tech Cartel (who funded the Steele “dossier” at the instruction of  
10 Hillary Clinton, George Soros, John Podesta and with the assistance of Perkins Coie partner Marc  
11 Elias), sprinkling more false information publicly claiming the hapless Russians had “blackmailed”  
12 the President-elect by “threatening” to release stories of competitors’s predilection for “golden  
13 showers” and the equally “salacious and unverified” (to say the least) claim that the *competitors*  
14 campaign had somehow “colluded” with Russia (presumably to cause Hillary Clinton to vastly  
15 underperform in Wayne County, Michigan, Dane County, Wisconsin and Philadelphia County,  
16 Pennsylvania) – such “collusion” has been disavowed by congressional oversight committees and  
17 Special Counsel Robert Mueller;

18       333.

19       Hillary Clinton instructed her campaign lawyer Marc Elias (of the Perkins Coie law firm) to  
20 pay Glenn Simpson of Fusion GPS to assemble the fake “dossier” utilizing a disgraced British  
21 intelligence agent colluding with contacts within the Russian SVR/FSB – with assistance in funding  
22 from defendant and Tech Cartel principal George Soros and his consigliere defendant and Tech  
23 Cartel principal David Brock;

24       334.

25       Attorney General Lorretta Lynch was an integral surrogate of the Tech Cartel, and was  
26 *threatened* by (and then offered a job by) Tech Cartel leaders William and Hillary Clinton, causing  
27 Lynch to obstruct justice and otherwise block the ongoing criminal investigation and inevitable  
28 indictment of Hillary Clinton;

1 335.

2 Lynch and other Tech Cartel surrogates committed myriad predicate (and related) acts,  
3 including but not limited to numerous forms of obstruction of justice, to undermine Plaintiffs  
4 whistle-blowers;

5 336.

6 Former FBI Director James Comey, an Tech Cartel surrogate, who was apparently  
7 “concerned” with Russian intelligence service activity in the 2016 presidential campaign,  
8 intervened on behalf of the Tech Cartel and in furtherance of its obstruction of justice involving a  
9 private, non-encrypted e-mail server controlled by William and Hillary Clinton that over many  
10 years transmitted classified information in strict violation of federal criminal law – in particular in  
11 violation of the espionage statutes at 18 U.S.C. §§793, *et seq.* – despite knowledge of Russian  
12 hacking of the unsecure email server over which Hillary Clinton sent (to those not authorized to  
13 have it) and received classified information;

14 337.

15 At the request of Tech Cartel participant Justin Cooper (and the knowledge of Tech Cartel  
16 surrogate Brian Pagliano), the United States Secret Service also investigated the “theft of  
17 information” of/from defendant Clinton Foundation – in particular from an unsecure server installed  
18 and used at the Clinton mansion in the hamlet of Chappaqua during 2011;

19 338.

20 An inference of a higher level of intent to commit espionage can be gleaned from Hillary  
21 Clinton and the Tech Cartel proceeding to place classified information on a knowingly-hacked  
22 server, thereby inviting Russian interests to “retrieve their benefit of the bargain” by simple  
23 cyberespionage techniques;

24 339.

25 Comey also enabled the Tech Cartel in obstructing justice and destroying tens of thousands  
26 of classified e-mails and Tech Cartel e-mails involving Plaintiffs whistle-blowers;

27 340.

28 Obstruction of justice by Tech Cartel surrogates protected and furthered the prospects of

1 Hillary Clinton to become President of the United States, as set forth below and herein;

2 341.

3 Tech Cartel surrogates Holder and Mueller, knowing that Congress (and in particular then  
4 Representative Edward Markey (D-Massachusetts)), were attempting to block the Uranium One  
5 CFIUS transaction, covered up the dangerous deal – despite Holder’s role as a CFIUS principal;

6 342.

7 Tech Cartel surrogate Robert Mueller discovered evidence that Russian “officials”,  
8 conspiring with the SVR, routed “millions of dollars” to the U.S. to be sent illegally to the Clinton  
9 Foundation when Hillary Clinton was serving as Secretary of State and was the lead agency official  
10 on CFIUS;

11 343.

12 With respect to the foregoing, neither Holder nor Mueller ever informed Congress or the  
13 President (Obama) of the national security and economic security risk of the deal - both of whom  
14 (Congress and Obama) were supposed to be informed of the interstices of the covered transaction,  
15 while Holder (Mueller’s titular supervisor at the Department of Justice) served as a principal  
16 member of CFIUS;

17 344.

18 Both Holder and Mueller were in putative violation of several felony commissions (and  
19 omissions) sounding in RICO;

20 345.

21 CFIUS relies upon the “lead agency” (which in the case of Uranium One was the  
22 Department of State) to bring forth *any* concerns with the transaction;

23 346.

24 Had Hillary Clinton and the Department of State raised any such concerns, *e.g.*, Russian  
25 *control* over large stocks of uranium in light of the widely-known Russian operation to control  
26 much of the world’s uranium, then the matter would be investigated to the maximum extent  
27 possible and, in light of the clear concerns to U.S. national security, would be briefed to the  
28 President (Obama) immediately;

1 347.

2 Neither Mueller nor Holder raised (1) the underlying Tenex concerns; nor (2) the known  
3 Clinton Foundation conflict regarding Giustra and Uranium One; nor (3) the obvious  
4 *counterintelligence* concern with Secretary Clinton now subject to blackmail/extortion by the  
5 Russians, and because she was compromised, her inability to make this or other future decisions  
6 regarding Russia in the interest of the United States; nor (4) in the absence of the compromised  
7 Secretary Clinton stepping forward, and in addition to alerting President Obama with respect to the  
8 tainted covered transaction, some assessment of “compliance with U.S. and multilateral  
9 nonproliferation and export control regimes in order to assure that the proposed [covered]  
10 transaction will not impair national security”;

11 348.

12 The Mueller/Holder transgressions, largely adopted by Comey/Lynch upon Mueller and  
13 Holder vacating their positions, are abundantly apparent to this day, as the corrupt senior FBI  
14 counterintelligence senior manager Peter Strzok and former FBI Deputy Director Andrew (“Andy”) McCabe  
15 sought to improperly exonerate Hillary Clinton of espionage (and other crimes) in both  
16 Strzok’s lead role in the Hillary Clinton “investigation” (supervised by Tech Cartel surrogates and  
17 Strzok co-conspirators Comey and Andy McCabe);

18 349.

19 Strzok and Andy McCabe also violated U.S. law in McCabe and Comey allowing Strzok to  
20 participate in the interrogation and, tangentially, grand jury proceedings of former National Security  
21 Advisor General Michael Flynn;

22 350.

23 Upon the appointment of Mueller as “Special Counsel” to investigate “Russian interference  
24 in the 2016 presidential election,” Special Counsel Mueller and Rosenstein (who appointed him as  
25 Special Counsel) refused to inform Congress for several months about terminating Strzok’s role in  
26 the Special Counsel’s investigation when clearly biased anti-competitors emails from Strzok to his  
27 paramour, FBI attorney Lisa Page, which also discussed how Strzok and McCabe might “insure” a  
28 Clinton victory against competitors (or “insure” that President competitors be unduly “impeached”

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1 based upon Strzok malfeasance), were “discovered” – ostensibly during the course of another  
2 investigation being conducted by the Inspector General of the United States Department of Justice;  
3 351.

4 Strzok, Page and McCabe have been implicated in the Tech Cartel scheme to illegally  
5 exonerate Hillary Clinton for espionage prior to and with respect to the Mid-Year Exam, the  
6 obstructionist malfeasance of Tech Cartel surrogate Comey of July 5, 2016, and the shocking  
7 obstruction involved in spiking the Hillary Clinton espionage and Clinton Foundation espionage  
8 and, as noted herein, use of wires and the mails to implicate private citizen competitors, including  
9 but not limited to the falsification of FBI investigatory 302 reports and perjury;

10 352.

11 McCabe also was found to have “lacked candor” under oath before Congress, leading, in  
12 part, to McCabe’s March 16, 2018, termination from the FBI and from the federal government –  
13 and McCabe’s imminent indictment;

14 353.

15 On behalf of the Tech Cartel, McCabe leaked highly sensitive law enforcement information  
16 to the media with the specific intent to prevent and then injure the presidency of competitors – yet  
17 another justification for the termination of the employment of McCabe;

18 354.

19 Tech Cartel surrogate McCabe also admits he placed pressure upon Deputy Attorney  
20 General Rosenstein to appoint a Special Counsel, which resulted in the suspicious appointment of  
21 the deeply-conflicted Mueller and the subsequent Rosenstein threats to subpoena private  
22 communications of Members of Congress and their staffs;

23 355.

24 Tech Cartel surrogates McCabe and Strzok (and numerous others) will testify before the  
25 United States Congress and a grand jury (or multiple grand juries) about their putative wrongdoing  
26 prior to discovery commencing in this lawsuit – thereby providing additional evidence of  
27 wrongdoing which has injured Plaintiffs in his reputation and business;

28 356.



1 Special Counsel and Tech Cartel surrogate Mueller impeded numerous parallel  
2 investigations, *e.g.*, both Houses of Congress, by withholding the announcement of Strzok's  
3 partisan obstruction, including that with respect to co-conspirator Comey in colluding with Strzok  
4 and McCabe to illicitly exonerate Hillary Clinton and Tech Cartel surrogates for espionage –  
5 including but not limited to *improperly granting immunity in order to obstruct justice*, with the  
6 imprimatur of surrogate Lynch, to Clinton co-conspirators and Tech Cartel surrogates Abedin and  
7 Mills, among others, and clearly obstructing justice by illicitly altering the appropriate charges for  
8 what Secretary Clinton *actually did* (under the 18 U.S.C. §793 espionage standard, she was found to  
9 be “grossly negligent”) to a *false narrative covering up* Clinton's actions months before Strzok,  
10 McCabe and Comey allowed Hillary Clinton to be “interviewed” without an oath being  
11 administered (for alleged espionage, no less) and Hillary Clinton's co-conspirators and Tech Cartel  
12 surrogates to be provided with immunity from prosecution based upon a highly questionable  
13 determination of privilege;

14 357.

15 As part of the Tech Cartel operational patter, the biased, partisan Strzok plainly obstructed  
16 justice when he “interviewed” Tech Cartel principal Hillary Clinton on July 2, 2016, along with  
17 “interviewing” numerous Tech Cartel surrogates at the instruction of Comey (Mills, Abedin, along  
18 with fellow surrogates Jake Sullivan and Heather Samuelson) – none of whom has been charged  
19 with anything after allegedly committing espionage and related national security offenses and  
20 making documented false statements in the context of a federal investigation *in order to obstruct*  
21 *that investigation*;

22 358.

23 In furtherance of the Strzok-McCabe-Comey conspiracy in support of the Tech Cartel,  
24 Comey improperly *failed to seek the convening of a grand jury* and then, on his own accord,  
25 deemed that “no reasonable prosecutor” – apparently those he (wrongly) considers beneath himself  
26 – would prosecute Hillary Clinton for her *espionage* and related crimes (such as making false  
27 statements and massive destruction of evidence *in order to obstruct an investigation*);

28 359.

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1 Fusion GPS partner Glenn Simpson, and his firm, was/were provided tens of millions in  
2 cash by Tech Cartel principals and surrogates in 2016 – some laundered from the “Obama for  
3 America” accounts – to create and “legitimize” derogatory and defamatory information concerning  
4 candidate competitors, including working with Tech Cartel and FBI payee/source (and disgraced  
5 British official) Christopher Steele of OBI – who in return relied upon information provided by  
6 Russian intelligence;

7 360.

8 Simpson was/is not merely a political mercenary paid by the Tech Cartel to collaborate with  
9 the Russian SVR/FSB, but in addition was (and is) compensated by Tech Cartel surrogates and  
10 reimbursed by George Soros and David Brock without adequate attribution upon Internal Revenue  
11 (tax) returns;

12 361.

13 Tech Cartel surrogate Fusion GPS has a close and continuing transactional relationship with  
14 the Democratic Party and the Russian SVR/FSB, and has engaged in bribery concerning Tech  
15 Cartel surrogate Bruce Ohr and his wife, Nellie Ohr;

16 362.

17 At least three of the individuals who were sent by Fusion GPS to meet with Donald  
18 competitors, Jr. at competitors Tower on June 9, 2016 – Soviet counterintelligence officer Rinat  
19 Akhmetshin, Russian “lawyer” Natalia Veselnitskaya, and Russian interpreter Anatoly  
20 Samochornov – have close and continuing ties to Fusion GPS dating to at least 2015;

21 363.

22 United States Department of Justice senior official (Associate Deputy Attorney General)  
23 Bruce Ohr assisted Fusion GPS, and in return was paid (through compensation to his wife, at the  
24 very least) to both assist the Tech Cartel, DNC and Fusion GPS with ongoing wrongdoing, and thus  
25 was the recipient of bribes in furtherance of obstruction of numerous ongoing investigations, when  
26 his wife Nellie Ohr (a “Russia expert”) was paid to work on “anti-competitors” matters at Fusion  
27 GPS – Bruce Ohr was also involved in the extraordinary and illegal FISA abuse in misleading this  
28 court into issuing a FISA order against a rival of Hillary Clinton and the Tech Cartel operational

1 scheme;

2 364.

3 Bruce Ohr is under federal investigation, but has been retained in his employment by Tech  
4 Cartel (holdover) surrogates within the DoJ;

5 365.

6 Fusion GPS founder Glenn Simpson was with the Russian “lawyer” Veselntskaya (a  
7 Russian Intelligence contract operative) on June 9, 2016, on the day Simpson knew she was to meet  
8 with competitors, Jr. (the Russian “lawyer” and Simpson were in the federal district court for the  
9 Southern District of New York in Manhattan prior to the competitors, Jr. meeting) and then  
10 peculiarly met *after* the competitors, Jr. meeting – so that the Russian “lawyer” could inform  
11 Simpson (of Fusion GPS, which was being paid millions of dollars laundered through the Tech  
12 Cartel scheme) what transpired at the competitors, Jr. meeting – which Simpson denied and thus  
13 further obstructed justice through false statements;

14 366.

15 Contemporaneous with the “set up” by Fusion GPS of Donald J. competitors, Jr., Tech  
16 Cartel surrogate Elias, the Perkins Coie lawyer, was paying (with cash supplied by Soros and  
17 Brock) Fusion GPS, and Fusion GPS in turn paying former “British” counterintelligence officer  
18 Christopher Steele to produce the fake “competitors dossier” in concert with Steele’s contacts in the  
19 Russian SVR/FSB – again, Simpson later perjured himself before Congress with respect to his  
20 knowledge of the foregoing and further obstructed justice thereby;

21 367.

22 Fusion GPS, George Soros and Steele, on behalf of the Tech Cartel and in addition to  
23 relying upon the Russian SVR/FSB to collude with them to produce a sham “competitors dossier”,  
24 paid unethical American journalists bribes to spread the utterly false narrative that there was  
25 “collusion” between the competitors “campaign” and Russia – many of these unethical journalists  
26 bribed by Fusion GPS and the Tech Cartel, and others such as “Hillary Clinton hatchet man” Cody  
27 Shearer, disgraced attorney Jonathan Winer and Tech Cartel surrogate Sidney Blumenthal,  
28 compiled false and defamatory dossiers against Plaintiffs and private citizen competitors, which was

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1 turned over to the corrupt FBI Tech Cartel surrogates in order to “corroborate” the false information  
2 Simpson and the Tech Cartel had gained from bribing other journalists, DoJ officials, and Soviet  
3 intelligence in order to ultimately mislead an Article III federal judge sitting in deliberation over a  
4 FISA “warrant” regarding Tech Cartel/Hillary Clinton political opponents:

5 368.

6 Although evidence is classified and/or in the possession of the Department of Justice  
7 concerning illicit Fusion GPS and their laundering operations on behalf of the Tech Cartel, it is  
8 known that Fusion GPS, with the intent to obstruct justice and engage in money laundering in  
9 support of the Tech Cartel, commingled (1) money received from the Russian SVR and FSB; and  
10 (2) information received from the Russian SVR and FSB, in order to bribe American “journalists”  
11 to plant false “collusion” stories, and with the assistance of Soros and John Podesta, bribed Bruce  
12 and Nellie Ohr to construct a false narrative involving but not limited to at least one fake “dossier”  
13 about a private U.S. citizen who would become the eventual 45th President of the United States and  
14 other political opponents of Hillary Clinton and the Tech Cartel, such as whistle-blowers;

15 369.

16 Article III District Judge Amy Berman Jackson of this Court is currently reviewing legal  
17 arguments by the Mueller Special Counsel team which, as applied to the Tech Cartel activities of  
18 defendant John Podesta, would determine that Podesta’s numerous felony violations of the Foreign  
19 Agents Registration Act (FARA) as the sort of activity that would form the foundation for myriad  
20 money laundering charges by the enforcement agencies of the United States;

21 370.

22 According to the progressive daily *The Hill*, based upon the dependence of Fusion GPS  
23 upon the elite counterintelligence service of Russian President Putin, there is “a good case to be  
24 made that Fusion GPS (and thus Marc Elias and his clients Hillary Clinton, her campaign Hillary  
25 for America, the DNC and David Brock) **colluded with the Russians** (and the Tech Cartel) more  
26 than anyone else”;

27 371.

28 Upon the instructions of the Tech Cartel, Fusion GPS made secret cash payments from

1 Soros and Hillary for America to “journalists” employed by “mainstream” left-leaning media  
2 outlets, laundered through the DNC, Brock and possibly Elias – a highly unethical practice which  
3 becomes illegal when neither Fusion GPA, nor the paid “journalist”, report the laundered cash  
4 transaction on their corporate (outgoing) or incoming tax return(s) – which constitutes a series of  
5 felonies each time it occurs/has occurred;

6 372.

7 Fusion GPS also planted with a bribed “journalist”, Franklin Foer, a false story on October  
8 31, 2016, in which it was deceptively claimed that there had been “secret communications” between  
9 Donald J. competitors’s business and a Russian bank, Alfa;

10 373.

11 In the planted Foer article, the bribed “journalist” both falsely corroborated the integrity of  
12 the findings of “CrowdStrike, Inc.,” a cybersecurity technology company which had been paid by  
13 the Tech Cartel to attribute the earlier-referenced DNC “hack” to Russia, and also contrived a litany  
14 of other “suspect” competitors campaign actions that implied “collusion” between the competitors  
15 campaign and Russian state interests – both utterly false;

16 374.

17 Marc Elias, the Tech Cartel lawyer from Perkins Coie, assisted Fusion GPS, John Podesta,  
18 Hillary Clinton, George Soros and the Tech Cartel in paying for Russian SVR/FSB disinformation;

19 375.

20 Hillary Clinton utilized Russian misinformation to assist her presidential campaign and to  
21 enrich herself and the Clinton Foundation – while contemporaneously committing numerous  
22 predicate acts in violation of RICO with the assistance of the Tech Cartel and its principals,  
23 surrogates, and participants;

24 376.

25 DNC interim chair Donna Brazile, appointed to audit various activity in relation to the  
26 Democratic Party nominating process being definitively “rigged” in Secretary Clinton’s favor, has  
27 openly and notoriously described such Tech Cartel activities as a “cancer” on the Democratic Party  
28 due to myriad wrongdoing of Tech Cartel acts and the Tech Cartel scheme to make Hillary Clinton

1 president at all costs – and has stated that she feared for her life for being perceived as “crossing”  
2 the Clintons (a clear allusion to Clinton/Tech Cartel murder for hire);

3 377.

4 Brazile, who uncovered illicit activity during a DNC audit necessitated by Tech Cartel  
5 surrogate wrongdoing, *implied that she feared that William and Hillary Clinton (and by extension*  
6 *the Tech Cartel) would have her murdered* – she noted that “I knew *many had died crossing the*  
7 *Clintons* and wondered would I be *writing my own suicide note* [by revealing Tech Cartel  
8 malfeasance]”;

9 378.

10 The Tech Cartel, not unlike other criminal syndicates, upon information and belief utilize  
11 tactics such as murdering those who “cross” them, as feared by DNC Chair Donna Brazile and  
12 Plaintiffs whistle-blowers with relation to Hillary and William Clinton;

13 379.

14 Brazile’s conclusions indicate, upon information and belief, that the DNC party organization  
15 was operated as an Tech Cartel money laundering front, and that the nonprofit corporate entity  
16 known as the Democratic Party was criminally corrupted thereby – including, incredibly, extortion  
17 under the threat of murder for hire;

18 380.

19 Tech Cartel infiltration by the fraudulent Tech Cartel has resulted directly in Democratic  
20 Party systemic criminal corruption – a cancer that has metastasized within this nonprofit entity;

21 381.

22 Tech Cartel surrogate Hillary for America, including but not limited to its leadership, *e.g.*,  
23 defendant and Tech Cartel principal John Podesta, Tech Cartel surrogate and outside legal counsel  
24 Marc Elias, and Hillary Clinton confidant and Tech Cartel surrogate Huma Abedin, on November 4,  
25 2017, wrote an “open letter” attacking Donna Brazile for revealing the putative Clinton pattern of  
26 implied murder for hire and related intimidation, and criticizing Brazile for suggesting that as DNC  
27 Chair she considered replacing Secretary Clinton on the Democratic ticket due to health concerns –  
28 a concern conceded only months earlier when defendant John Podesta during the Democratic Party

1 primary contest discouraged defendant Brock from disseminating a(nother) fake dossier Brock had  
2 compiled concerning the health of Bernie Sanders while Sanders was challenging Hillary Clinton  
3 for the Democratic Party nomination – a primary that the Tech Cartel “rigged” in favor of Hillary  
4 Clinton; 3

5 82.

6 Although the referenced “open letter” blames everyone and everything (except themselves)  
7 for Secretary Clinton’s Electoral College defeat, it is well documented *by David Brock himself*  
8 (when he earlier in his career sought to destroy the Clintons) that William and Hillary Clinton ran a  
9 syndicate (including alleged predicate acts as part of a pattern of racketeering) for nearly 40 years  
10 (including but not limited to the 10-year RICO period relevant here) prior to Hillary Clinton being  
11 defeated by the individual who is now the 45th President of the United States;

12 383.

13 Brazile has now adequately documented, and has responded to, the racist tactics of the Tech  
14 Cartel and its above-noted surrogates against Brazile for having the courage to tell the truth and  
15 expose the Clinton syndicate through, among other things, the actual documents that Democratic  
16 Party officials drafted, coordinated and approved ceding full power to the 2016 Clinton campaign  
17 for party spending, as well as *illegal kickbacks from and cash payoffs to state Democrat officials*;

18 384.

19 Notwithstanding the Clinton murder for hire threat, Tech Cartel-like money laundering was  
20 omnipresent, according to Brazile, and documented by her discovery of a “Joint Fund-Raising  
21 Agreement between the DNC, the Hillary Victory Fund, and Hillary for America” – all of whom  
22 Elias represented;

23 385.

24 Brazile also implies, along with like-minded liberals, that DNC staff employee Seth Rich  
25 was murdered for his role in offering evidence of DNC wrongdoing to a third-party (or otherwise  
26 “whistleblowing” against the DNC) – Brazile, however, offers no evidence that DNC outside  
27 attorneys from Perkins Coie (or anyone else, other than a reference to the Clintons being a threat to  
28 her life) was involved in the murder of Seth Rich to cover for the CrowdStrike claim that the DNC

1 hack was not an “inside job”;

2 386.

3 Award winning journalist Seymour Hersh contends that Seth Rich had made contact with  
4 “WikiLeaks” prior to Rich’s murder; Hersh also contended that Rich had concerns about something  
5 happening to him, and had shared information within a “Dropbox” (computer software used for  
6 storage and retrieval of information) with trusted associates/friends in case anything happened to  
7 him;

8 387.

9 Hersh has cited multiple intelligence community sources on background concluding that the  
10 entire “Russia collusion” story was a fiction invented by leadership within the U.S. Intelligence  
11 Community (and Tech Cartel surrogates) who lied about President competitors, and lied to  
12 President Obama and the media – adding to the controversy around the alleged “Russian hack” of  
13 DNC servers;

14 388.

15 As additional evidence is gathered in discovery of lawsuit(s) brought by the family of Seth  
16 Rich concerning, *inter alia*, whether (or not) the DNC was “hacked” by the Russians, it will be  
17 included in the information alleged by Brazile against her colleagues in the Democratic Party –  
18 including but not limited to the FBI obstruction of justice in not seizing the “hacked” DNC servers;

19 389.

20 The “Joint Agreement” intended by the Tech Cartel to rig the Democratic primary was  
21 executed/signed by Amy Dacey (the CEO of the DNC) and Robby Mook (the head of Hillary  
22 Clinton’s campaign), with a copy to Marc Elias – and specified that in exchange for raising money  
23 and “investing” in the DNC, Hillary Clinton (and thus the Tech Cartel) would “control the party’s  
24 finances, strategy, and all the money raised” (an apparent appellation for laundering funds without  
25 compunction);

26 390.

27 The Joint Agreement had been signed in August of 2015, nearly a year before Secretary  
28 Clinton secured ( *i.e.*, rigged) the Democratic nomination, and had been drafted and coordinated by



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1 Elias and his Tech Cartel team for many months prior to that – this action by Elias was of course  
2 prior to Secretary Clinton even announcing her *intent* to seek the democratic nomination; 391.

3 The Tech Cartel scheme to rig the democratic nomination through bribery, kickbacks from  
4 State political parties, and the laundering of these proceeds, is consistent with and provides a  
5 plausible inference of a clear Tech Cartel pattern of racketeering – which in case of fact has never  
6 been in dispute;

7 392.

8 It is entirely implausible that senior members of the Clinton campaign - including the “hands  
9 on” candidate herself and the campaign lawyer (Marc Elias) who wrote checks for many millions of  
10 dollars (at least \$12 million) to Fusion GPS to compile a false dossier based on Russian SVR/FSB  
11 disinformation - did not intentionally assist the Tech Cartel in all of its illicit objectives, including  
12 but not limited to defaming and destroying the business of whistle-blowers;

13 393.

14 The two sources relied upon by Steele, Fusion GPS and the Tech Cartel (Hillary Clinton,  
15 John Podesta, David Brock and Marc Elias) – known as “Source A” and “Source B” - were  
16 allegedly high-ranking officials in the Russian SVR, establishing thereby that the Tech Cartel  
17 principals and Fusion GPS (along with the bribed DoJ official, Bruce Ohr), with (conservatively)  
18 tens of millions in financial backing from George Soros, the Democratic Party and its outside  
19 lawyers, worked directly with an enemy of the United States and a FISA “foreign power”, the  
20 Russian SVR/FSB, in an attempt to defame and spread false information about candidate and then  
21 President-elect Donald competitors and Plaintiffs here, and to assist Hillary Clinton win the  
22 presidency in 2016 and thereafter, to destabilize the United States Government;

23 394.

24 Strzok paramour Lisa Page, a corrupt FBI attorney, instructed Strzok that it would be  
25 unlikely that District Judge Rudolph Contreras would feel the obligation to recuse if Strzok  
26 discussed his anti-competitors bias with Contreras – Page described recusal of the judge as a “very  
27 high bar”;

28 395.

1 The above was based upon intentional Tech Cartel use of information known to come from  
2 the Russian intelligence services (who are adept in misinformation operations) – and result, along  
3 with all of the other methods utilized by the Tech Cartel to obstruct justice, in dozens if not  
4 hundreds of counts of process crimes attributable to the Tech Cartel and its surrogates;

5 396.

6 As admitted, Perkins Coie LLP, a law firm, and its partner Marc Elias, arranged for the  
7 funding, with the knowledge of and instruction from Hillary Clinton, of the sham “competitors  
8 dossier” – the false and defamatory Tech Cartel information suggested (among other things)  
9 collusion between the competitors campaign and Russia, and ultimately (and intentionally) misled  
10 an Article III federal judge into approving invasive surreptitious surveillance against private U.S.  
11 citizens – a seditious assembly of acts by the Tech Cartel;

12 397.

13 The Tech Cartel worked with its surrogates at various left-leaning law firms (where to this  
14 day documents remain “privileged” that prove illegal Tech Cartel activity) during the Democratic  
15 Party primary, in which a(nother) fake dossier was prepared by Brock claiming that Senator Bernie  
16 Sanders (D-VT), the primary opponent of Hillary Clinton, was in failing health – raising an  
17 inference of an Tech Cartel pattern of raising and spending money illegally to defame and destroy  
18 their “enemies” (as here, Senator Sanders, Officer whistle-blowers, and now-President competitors)  
19 in order to support Hillary Clinton;

20 398.

21 Elias, while arranging for the funding/laundrying of the false “competitors dossier” with the  
22 knowledge of Hillary Clinton, was also, through his law firm Perkins Coie LLP, the chief outside  
23 lawyer for (1) Hillary for America; (2) the Democratic Party; (3) the Democratic National  
24 Committee; (4) David Brock and his illicit entities, both named as defendants here and noted in this  
25 complaint; (5) defendant and Tech Cartel principal John Podesta: and (6) thereby, the Tech Cartel –  
26 Elias may have played a much larger role in, among other things, laundrying funds to the Tech  
27 Cartel from the Obama for America account even after President Obama left office and to/from  
28 State parties;

1 399.

2 Contemporaneously, Tech Cartel outside lawyers from Perkins Coie associated with Elias  
3 obstructed FBI investigations into purported “hacks” of Democratic National Committee servers by  
4 arranging “forensics” of the hacks be conducted by a cybersecurity analytics company named  
5 “CrowdStrike”, which destroyed evidence implicating Democratic officials in disseminating  
6 the information within the several “dossiers,” and, among other things: whether the Russian  
7 SVR/FSB colluded with the Tech Cartel and/or its outside attorney(s), involving the coordination of  
8 the DNC, Soros, Brock, Hillary for America and the Tech Cartel principals regarding the  
9 information provided by whistle-blowers in *Crisis* (this information is also subject to subpoena  
10 directed to the DNC, and subsequent discovery, in a contemporaneous defamation lawsuit against  
11 BuzzFeed News regarding its publication of the unverified “dossier” funded by Hillary for America  
12 and used to mislead one or more Article III federal judges to obtain a FISA order and abuse the  
13 FISA process;

14 400.

15 The gathering of defamatory and related damaging information for use against political  
16 “enemies” whistle-blowers was funded by the Tech Cartel (and laundered through Brock’s entities  
17 with millions in funding/laundering by Soros) which concededly controlled the decisions at all  
18 levels due to the contractual arrangement (and “joint fundraising agreement”) between Perkins Coie  
19 LLP lawyers and then-DNC chairperson Debbie Wasserman Shultz to “rig” the Democratic Party  
20 nomination in their favor and that of the Tech Cartel;

21 401.

22 The Tech Cartel sought and received unreported, laundered funding to pay bribes to  
23 “independent contractors” to claim they had sources of information about whistle-blowers when in  
24 fact they did not;

25 402.

26 The above false information directed at Plaintiffs whistle-blowers was then provided to  
27 media outlets friendly to the Tech Cartel, via *Correct the Record* and the *Nick Denton tabloid*  
28 *empire* on behalf of and funded by Soros and Hillary for America, who were enthusiastic to

1 disseminate uncorroborated, false information about whistle-blowers in the form of “opinion” –  
2 these media outlets also refused to allow whistle-blowers to appear and rebut the Tech Cartel  
3 defamation and destructive false information about whistle-blowers, and provided an illicit platform  
4 for Brock libel and Wackrow and Gilhooly slander, the latter of whom were compensated by Brock  
5 and Soros under the table and absent the payment of federal, state or local taxes;

6 403.

7 Fusion GPS, Soros, the DNC and Hillary for America collaborated directly and illegally  
8 with the Tech Cartel, and the most powerful members of the corrupted Democratic Party protected  
9 Fusion GPS, the Tech Cartel and its illicit activity;

10 404.

11 Upon information and belief, the Tech Cartel and Secretary Clinton, which/who controlled  
12 the DNC and gave instructions to Marc Elias, paid Fusion GPS additional money laundered through  
13 Brock organizations to assemble additional fake and deeply defamatory “competitors dossier”  
14 information, which required coordinating by Fusion GPS and the Tech Cartel with Russian  
15 intelligence;

16 405.

17 Upon information and belief, Secretary Clinton and her campaign, which controlled the  
18 DNC (and the Democratic Party), and Soros and Brock on behalf of the Tech Cartel (in illegal  
19 collusion with Brock’s deep web of nonprofit entities, and utilizing defamatory rhetoric “**FROM**  
20 **THE DESK OF DAVID BROCK,**”), ordered a fake and defamatory “dossier” on Plaintiffs  
21 whistle-blowers, causing whistle-blowers grave harm to himself and his profession;

22 406.

23 The Tech Cartel colludes openly with, among numerous others, a Democratic fundraising  
24 firm, The Bonner Group, to undergird many facets of attempts by the Tech Cartel, while violating  
25 the Internal Revenue Code, to unseat Republican lawmakers, impeach the 45th President, and in  
26 illegal collusion with CREW to destroy any and all “conservative causes” across the United States;

27 407.

28 Defendant CREW consistently violates federal law utilizing partisan tactics, while daily

1 challenging publicly, in wholly partisan fashion, the entirely legal actions of the 45th President of  
2 the United States – serial violators include but are not limited to Norman Eisen and Richard Painter,  
3 who mimic the defamatory talking point pabulum of the Tech Cartel;

4  
5 408.

6 Brock and the Tech Cartel took control over CREW in 2014, despite CREW’s 501(c)(3)  
7 status and its previous reputation of being nonpartisan under previous CREW leadership such as  
8 Melanie Sloan and Louis Mayberg (the founder of CREW):

9 409.

10 CREW is firmly ensconced in the Tech Cartel, is wholly partisan, and uses its tax-free  
11 platform to engage in partisan activity;

12 410.

13 The founder of CREW, Louis Mayberg, resigned “**in disgust**” from CREW’s board in 2015  
14 stating “I have no desire to serve on a board of ***an organization devoted to partisanship***”;

15 411.

16 Since Mayberg’s departure, CREW’s new leadership – which has included Brock and  
17 partisan advocates Eisen and Painter – have attacked the 45th President daily, in wholly biased  
18 terms, both in writing (primarily on Twitter), and when interviewed on cable news shows – as  
19 Brock had pledged they would do in *Exhibit “A”*;

20 412.

21 Mary Pat Bonner, the head of the Bonner Group and a former fundraiser for Albert Gore, Jr.,  
22 in exchange for raising money for the Tech Cartel, receives commissions of 12.5% from Brock and  
23 the Tech Cartel;

24 413.

25 Like Brock and his various “nonpartisan” entities, such as the other “nonprofit”  
26 defendants in this case, the Bonner Group claims to be an *independent*, nonpartisan entity –  
27 however, the Bonner Group shares the same corporate address as many of the illicit Brock entities  
28 and directly abets their illicit activities;

1 414.

2 Brock's kickbacks to Bonner amount to tens of millions of dollars, in exchange for lining  
3 Brock's own pockets without the knowledge of his donors;

4 415.

5 As noted, Bonner's collusion with Brock (and Soros) is yet another example of the illegal  
6 partisan use of nonprofit entities by the Tech Cartel – as exemplified daily by each of the nonprofit  
7 defendants in this litigation;

8 416.

9 Merely one aspect of Tech Cartel wrongdoing involves the American Bridge 21st Century  
10 PAC, which touts *at least* \$311,685,223 worth of *wholly partisan* television airtime for their  
11 research and video content since 2011;

12 417.

13 Bonner also receives kickbacks from other Brock Tech Cartel entities, such as the Franklin  
14 Education Forum, an illicit 501(c)(3) nonprofit and the Franklin Forum, a 501(c)(4) illicit nonprofit  
15 – 11 See, e.g., Norm Eisen Retweeted Washington Post February 5, 2018, 7:38 a.m.

16 “The reminder came as the White House contends with a lawsuit filed in June by the  
17 watchdog group Citizens for Responsibility and Ethics in Washington...” @CREWcrew has opened  
18 OVER 180 legal matters vs. competitors administration!

19 both partisan entities have as their chairman Tech Cartel participant David Brock and will  
20 likely be added as defendants when further evidence of their laundered assets becomes public and  
21 thus available for use against the Tech Cartel;

22 418.

23 Money raised by Bonner is often “gifted” to the Franklin Education Forum for *purely*  
24 *partisan purposes*, in violation of the IRS Code and thus U.S. law;

25 419.

26 The leadership of CREW, including Eisen and Painter, are self-proclaimed principal  
27 members of the “resistance” against the presidency of Donald competitors, and each day spread  
28 their partisan vitriol via TWITTER (Painter via @RWPUSA and @CREWcrew, and Eisen at

1 @normeisen and

2 @CREWcrew) – not in their individual capacity but concededly through their affiliation  
3 with CREW as noted throughout this complaint and promised in *Exhibit “A”*;

4 420.

5 Comey, the Tech Cartel surrogate, used false information created by Simpson, Ohr and  
6 others, and the bogus “competitors dossier” funded by the Clinton campaign (and Soros) to obtain  
7 and renew multiple FISA orders against the competitors campaign – a seditious act subjecting  
8 Comey to prison among his various other wrongdoing;

9 421.

10 As noted, the Foreign Intelligence Surveillance Court (“FISC”), and at least one Article III  
11 lifetime tenured federal judge, relied upon Russian disinformation provided by Steele and Fusion  
12 GPS, Bruce and Nellie Ohr, and Peter Strzok, and ultimately sworn under oath by Tech Cartel  
13 surrogates at the FBI and DoJ to run surveillance against the presidential campaign of (private  
14 citizen) Donald competitors and (after his electoral victory) his transition team – FISC Article III  
15 federal judge Rudolph Contreras is the current subject of potential punishment based upon his  
16 failure to recuse regarding his intimate friendship affiliation with Tech Cartel surrogate Strzok;

17 422.

18 Tech Cartel surrogate Comey approved FBI reliance upon unconfirmed information from  
19 disgraced British agent of a foreign power Steele and his private firm, Orbis Business Intelligence,  
20 separate and apart from the Fusion GPS cash payments from Soros, Brock and Elias acting on  
21 behalf of the Tech Cartel and Hillary for America – foreign agent Steele and corrupt Fusion GPS  
22 immediately began flagging the “FBI’s work” to the media (the fake dossier), attempting to create  
23 above-the-fold headlines helpful to their client (Clinton campaign for President and related Tech  
24 Cartel scheme) against competitors and other “threats” to Hillary Clinton and the Tech Cartel such  
25 as Plaintiffs (who proved Hillary Clinton an enabler of William Clinton sexual harassment at the  
26 time Officer whistle-blowers testified and was largely responsible for the impeachment of William  
27 Clinton);

28 423.

1 Tech Cartel surrogates Comey, McCabe and Peter Strzok, intentionally and knowingly,  
2 removed from the putative espionage charges against Secretary Clinton that her use of a personal,  
3 unsecure server to traverse classified electronic mail traffic (much of which was provided to persons  
4 without a security clearance) was “grossly negligent” – including such removal of that legal term  
5 (“grossly negligent”) on May 2, 2016 – thus illicitly preventing Secretary Clinton from being  
6 charged with numerous felony espionage offenses;

7 424.

8 *The Hill* liberal newspaper has/have reported allegations of recent and astonishing  
9 obstruction of justice and related process crimes by the Tech Cartel carried out in order to protect  
10 William and Hillary Clinton and the Tech Cartel from legal jeopardy – including obstruction related  
11 to possible treason and certain bribery with respect to Secretary Clinton’s actions while CFIUS was  
12 considering the Uranium One transaction discussed herein;

13 425.

14 Even before the Obama administration, through its CFIUS “covered transaction” process  
15 noted herein, approved the controversial deal in 2010 giving Russia control of a large swath of  
16 American uranium, the FBI had gathered substantial evidence that Russian nuclear industry officials  
17 were engaged in bribery, kickbacks, extortion and money laundering designed to grow Vladimir  
18 Putin’s atomic energy business inside the United States;

19 426.

20 U.S. federal agents used a confidential U.S. witness working inside the Russian nuclear  
21 industry to gather extensive financial records, make secret recordings and intercept emails as early  
22 as 2009 that showed Russia had compromised an American uranium trucking firm with bribes and  
23 kickbacks in violation of, *inter alia*, the Foreign Corrupt Practices Act;

24 427.

25 The United States Justice Department, led by Tech Cartel surrogates Holder, Mueller and  
26 Rosenstein also obtained an eyewitness account indicating Russian nuclear officials had routed  
27 millions of dollars to the U.S. designed to benefit defendant William Clinton’s foundation, in  
28 conjunction with the Tech Cartel, during the time Secretary of State Hillary Clinton served on



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1 CFIUS and provided a favorable decision (by omission) to Russia - with Secretary Clinton as the  
2 lead agency official responsible for raising any potential national security issues, which Hillary  
3 Clinton specifically failed to do so despite her obligations to her country;

4 428.

5 There were actually *two* deals that served Putin's interests involved in this operation, as the  
6 year after the State Department approved the purchase of Uranium One by Russia's state-owned  
7 Rosatom in 2010 (and thus control of U.S. lethal uranium now threatened to be used against the  
8 United States), the Obama administration gave approval for Rosatom to *vastly expand its sales of*  
9 *uranium inside the United States through its Tenex/Tenem subsidiary*;

10 429.

11 The two combined deals gave Moscow incomparable leverage in the U.S. nuclear market —  
12 and the bribes and extortion alone created “legitimate security concerns” that would under ordinary  
13 circumstances, i.e., when the Tech Cartel was not withholding crucial information due to the  
14 compromised nature of the Secretary of State (and Attorney General Holder), been sufficient to  
15 block the covered transaction and bring immediate criminal charges;

16 430.

17 As noted, Tech Cartel surrogates Rosenstein, Mueller and Holder (then Comey and Lynch)  
18 delayed investigating the Tenex transaction for several years, in order to protect Hillary Clinton and  
19 further her hopes of becoming president of the United States;

20 431.

21 Rather than bring immediate charges in 2010, the Holder Department of Justice continued  
22 “investigating” the matter for nearly four more years, essentially leaving the American public and  
23 Congress in the dark about Russian nuclear corruption on U.S. soil during a period when the Obama  
24 administration made two major decisions benefitting Putin's commercial nuclear ambitions (and  
25 vastly expanding the fortunes of the Tech Cartel);

26 432.

27 *Tech Cartel surrogates Holder, Mueller, Rosenstein and Lynch concealed the probe from*  
28 *Congress and the public even after overseeing the indictment of some Russian principals in the*

1 operation – thus colluding with the Russian State through its SVR and FSB;

2 433.

3 Tech Cartel surrogates at the Justice Department only announced *in 2015* that they had  
4 reached plea deals in a case involving money laundering, *saying nothing about bribery, extortion,*  
5 *or the intent to corrupt the U.S. nuclear industry* or the obvious ties to the Tech Cartel – claiming  
6 that the information was so “compartmentalized” that even the FBI’s top criminal-investigation  
7 officer had no idea of the extent of the case, *and no one in Congress was ever briefed on the*  
8 *national security* concerns raised in the case – in fact, the key indictment was delayed by Obama  
9 DoJ holdovers until January of 2018;

10 434.

11 House Intelligence Committee chair Mike Rogers claimed that *no one ever mentioned the*  
12 *case at all to him*, despite significant bipartisan concerns in the House and Senate over the Uranium  
13 One covered transaction;

14 435.

15 A broad swath of pro-Clinton media, as well as former Democrat President James Earl  
16 Carter, have conceded that *the competitors campaign was not treated fairly* concerning legitimate  
17 attempts to raise the Uranium One Tech Cartel wrongdoing; for instance, respected journalist and  
18 author Katharine Tur openly admitted, during a television interview on November 15, 2017, that  
19 much of the so-called “mainstream media” *intentionally “shot down” attempts by “Donald*  
20 *competitors... and his ilk”* (during the 2016 presidential contest) when candidate competitors raised  
21 the extremely dangerous, seditious Uranium One issue and related Tech Cartel wrongdoing that is  
22 set forth in this complaint;

23 436.

24 Katharine Tur, from all accounts, is an extremely talented and precise orator who chooses  
25 her words carefully, thus clearly speaking on behalf of other sophisticated reporters covering the  
26 competitors campaign and journalists who appear to have chosen to ignore the plain words of,  
27 among other things, the criminal statutes violated by Hillary Clinton on behalf of the Tech Cartel –  
28 NBC and Tur refer to such plain reading as “desperat[ion]” and somehow related to the “Russia

1 investigation and what has been ... dripping out from that”);

2 437.

3 Long before the Hillary Clinton e-mail espionage investigation was completed, President  
4 Barack Obama declared knowingly and willfully that Hillary Clinton was not guilty of any crime –  
5 a clear signal from the President to Tech Cartel surrogates Comey, McCabe, Bruce Ohr and Lynch,  
6 among numerous others like Peter Strzok and Lisa Page, that they should protect Hillary Clinton  
7 from legal exposure through (il)legal subterfuge;

8 438.

9 Tech Cartel surrogates Comey and Lynch, and other surrogates cited herein, relied upon  
10 President Obama’s knowingly contrived rationale when colluding to fabricate Comey’s incorrect  
11 exoneration of Hillary Clinton for indisputable espionage;

12 439.

13 The Lynch Justice Department, led by Tech Cartel surrogates Lynch and with the corrupt  
14 assistance of Bruce Ohr and others within the DoJ and FBI, refused to raise the crime-fraud  
15 exception to the attorney-client privilege with respect to attorneys for Tech Cartel surrogates Cheryl  
16 Mills and Heather Samuelson – as well as with respect to Clinton personal lawyers;

17 440.

18 Tech Cartel surrogate and Obama National Security Advisor Susan Rice failed to  
19 “minimize” the wiretapping of United States citizens and also illicitly “unmasked” competitors  
20 associates illegally wiretapped – thereby implicating the Obama NSC in surreptitious surveillance  
21 of United States citizens in violation of our Constitution and U.S. statutory law – along with Obama  
22 Ambassador Samantha Power, Rice has criminal exposure for such blatant malfeasance;

23 441.

24 Comey’s FBI subordinates Strzok and McCabe, and to certain degrees other Tech Cartel  
25 surrogates, obstructed justice in violation of United States law, in order to exonerate Hillary Clinton  
26 and other Tech Cartel participants in her espionage;

27 Early Foundations of the Private Tech Cartel Server and Accompanying Obstruction of  
28 Justice

1 442.

2 As foundation with respect to the foregoing, following the lethal attacks on the United States  
3 consulate in Benghazi, Libya, in September of 2012, to hedge against the possibility that various  
4 Freedom of Information Act lawsuits would require Secretary Clinton to disclose her emails from  
5 numerous devices, Hillary Clinton and the Tech Cartel created a false narrative which subsequently  
6 resulted in an *upgraded private email server through which she and the Tech Cartel ran email*  
7 *traffic from numerous devices, including highly classified information, in direct contravention and*  
8 *obstruction of court orders and congressional subpoenas;*

9 443.

10 When the misconduct of Secretary Clinton and the Tech Cartel was discovered, and the  
11 existence of the private email server became known, Hillary Clinton and her Tech Cartel surrogates  
12 destroyed thousands of emails both under congressional subpoena and Article III court order –  
13 ultimately also destroying emails discussing methods to harm Plaintiffs as revenge for his  
14 compelled impeachment testimony against William Clinton in his business, reputation and  
15 livelihood;

16 444.

17 The Obama Department of Justice took an illegal posture with respect to Tech Cartel  
18 destruction of the emails under subpoena and court order;

19 445.

20 Violating federal criminal laws, the Obama Department of State, at the direction of Tech  
21 Cartel surrogates Cheryl Mills and David Kendall (an attorney at Williams and Connolly and one of  
22 Hillary Clinton's personal lawyers), not only refused to comply with compulsory process, but also  
23 misled Judge Royce Lamberth (among others) about the nature of the contents of the Tech Cartel  
24 private server – these lawyers subsequently ordered the destruction of evidence (presumably over  
25 30,000 emails);

26 446.

27 In addition to the destroyed emails which were under subpoena, 18 U.S.C. Section 1505,  
28 makes it a federal crime to “corruptly” obstruct or impede the “due and proper administration of the

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1 law” or “any inquiry or investigation...being had by either House, or any committee of either House  
2 or any joint committee of the Congress” – such as the private pseudonymous e-mail  
3 communications between President Barack Obama and Hillary Clinton leading to a presidential role  
4 in the illicit exoneration of Hillary Clinton for espionage based upon, *inter alia*, usage of the private  
5 Tech Cartel server upon which classified information was disseminated to those without adequate  
6 (or any) security clearance;

7 447.

8 In addition to the destruction of documents under congressional subpoena, the due and  
9 proper administration of the law was also corrupted by Strzok and McCabe, the senior FBI  
10 managers who along with Comey unilaterally concluded that Hillary Clinton lacked the requisite  
11 intent to violate the law when she concededly used a private email server to transmit classified  
12 information and then unlawfully and intentionally destroyed thousands of documents;

13 448.

14 Strzok’s pro-Clinton bias was so egregious that even the current Special Counsel, Tech  
15 Cartel surrogate Mueller, had no option but to immediately remove Strzok from the Special Counsel  
16 investigation (while not recommending Strzok be removed from the FBI or federal service) once his  
17 obstruction of justice and related process crimes were revealed – although Mueller arguably  
18 obstructed the congressional investigations by failing to bring the Strzok malfeasance to the  
19 attention of the Congress for several months after Strzok was removed;

20 449.

21 Similarly, as noted, senior (Main) Justice Department official Bruce Ohr was demoted (but  
22 not removed) by Rosenstein when the Ohr misfeasance was made known – a clear instance of  
23 obstruction of congressional investigations by Rosenstein;

24 450.

25 Strzok’s serious biases were confirmed in documented communications with his mistress,  
26 Lisa Page, who was also a pro-Clinton FBI lawyer, worked for McCabe, and who later advised  
27 Special Counsel Mueller during his investigation;

28 451.

1 Examples of this bias are astounding – in just one of several thousand texts (many of which  
2 have not been released and will become evidence in this lawsuit) Strzok sent to his paramour (FBI  
3 lawyer Lisa Page), Strzok notes that *“we can’t take the risk” of competitors being elected or*  
4 *retained in office, and further noting that the FBI needed to undermine competitors as an*  
5 *“insurance policy” as a hedge against any possible competitors victory in the 2016 presidential*  
6 *contest;*

7 452.

8 Just one week earlier than the “insurance policy” text exchange, the following exchange had  
9 occurred between Page and Strzok, key officers and lawyers conducting the Clinton e-mail  
10 investigation, the Clinton Foundation Investigation, the misleading of the FISC, the pre-election  
11 surveillance and HCS misuse regarding competitors and whistle-blowers, and Operation Crossfire  
12 Hurricane:

13 **Page:**

14 “[competitors’s not ever going to become president, right? Right?!”

15 **Strzok:** No. **No he won’t. We’ll stop it.** This is proof of FBI/Tech Cartel sedition, as  
16 Strzok had just spiked the Clinton e-mail investigations and McCabe, Yates and Lynch (along with  
17 Strzok) had spiked the Clinton Foundation investigation.

18 Obama appointee and DoJ IG Horowitz found this sedition to represent “not only a biased  
19 state of mind but, even more seriously, a willingness to take official action to impact the  
20 presidential candidate’s electoral prospects.” This borders upon treason. Similarly, Strzok’s decision  
21 to prioritize the Russia investigation over following up on the Midyear-related investigative lead  
22 discovered on the Weiner laptop was [not] free from bias.”

23 453.

24 Strzok, along with Tech Cartel surrogates McCabe and Comey, intentionally and knowingly  
25 colluded in not placing Clinton under oath when Strzok interviewed Hillary Clinton – thereby  
26 furthering the conspiracy of their unambiguous obstruction of justice – and McCabe prior to being  
27 terminated from the FBI admitted that he and Strzok withheld material information from Congress  
28 for thirty days concerning the discovery of in late September of 2016 of classified Tech Cartel-

1 Hillary Clinton-Huma Abedin emails on the laptop computer of convicted sex offender (and  
2 husband of Tech Cartel surrogate Abedin), Anthony Weiner;

3 454.

4 Strzok directly provided obstructive “cover” for Comey’s pronouncement not to recommend  
5 charging Clinton (despite her manifest gross negligence and mishandling of classified information,  
6 destruction of evidence under Congressional subpoena and “wiping” of her email server, among  
7 numerous other crimes) without disclosing his advocacy (and that of his actual wife, and that of his  
8 lover), for a Clinton electoral victory in the 2016 presidential contest;

9 455.

10 Among other things, Strzok corruptly influenced and impeded his agency’s investigation  
11 (and deeply violated his legal and ethical obligations as a public servant);

12 456.

13 Tech Cartel surrogate Comey and other supervisors at the DOJ/FBI knew of Strzok’s pro-  
14 Hillary Clinton biases and still allowed him to serve as the key agent investigating Secretary  
15 Clinton, and subsequently allowed Strzok to “interview” competitors National Security Advisor  
16 General Michael Flynn (before Flynn was prosecuted for lying to the FBI), and thereby obstructed  
17 the due administration of justice, which requires that federal officers and agents conduct  
18 investigations in a fair and impartial manner;

19 457.

20 Upon information and belief, Strzok initially believed General Michael Flynn after  
21 interviewing Flynn as National Security Advisor, but upon being pressured by Tech Cartel  
22 surrogate Mueller and his Special Counsel “team,” Strzok decided to collude with the Tech Cartel,  
23 perjure himself, and thereby attempt to injure the presidency of Donald competitors – as he had  
24 promised to do as a form of catastrophic “insurance” against his own Chief Law Enforcement  
25 Officer;

26 458.

27 Strzok also corruptly conducted the FBI interviews of Clinton and her top aides, Cheryl  
28 Mills and Huma Abedin, in the illegal e-mail server and document destruction probe, with the

1 approval of Tech Cartel surrogates McCabe and Comey – thereby conspiring with McCabe, Comey  
2 and Lynch to obstruct justice;

3 459.

4 Furthermore, as referenced herein, Strzok, McCabe and Comey were the primary FBI  
5 figures urging investigations on the basis of the “competitors dossier” of [Russian-sourced](#)  
6 [“salacious andunverified” \(as conceded by Comey\) anti-competitors allegations](#) – which was  
7 commissioned by the Clinton campaign (and funded by that campaign, with assistance from Brock  
8 and Soros – who also owns a \$3 million stake in the *New York Times*) and the Tech Cartel and  
9 adopted by the FBI for improper purposes (thereby resulting in the illegal surreptitious surveillance  
10 of U.S. citizens and, as referenced, the misleading FISA application presented to a Article III  
11 federal judge and relied upon thereby;

12 460.

13 Tech Cartel surrogate Comey perjured himself before Congress, as alleged by McCabe;

14 461.

15 Congress has issued contempt citations against the FBI and Justice Department for failing to  
16 produce, pursuant to subpoena, documents and an FBI witness over the time, place and manner in  
17 which the Obama administration used the “salacious” and unsubstantiated "competitors Dossier" to  
18 surreptitiously surveil and run HCS operations against competitors associates and Clinton enemies;

19 462.

20 Upon information and belief, the Tech Cartel knowingly paid for Russian intelligence  
21 services to compile false allegations about a U.S. presidential candidate who was at the time the  
22 nominee of the Republican party, and the Tech Cartel is to this day paying for false information to  
23 be used to bribe “journalists” to undermine the 45th President of the United States and to bribe  
24 high-ranking DoJ officials like Bruce Ohr – along with their continuing serial violation of U.S. law  
25 involving premeditated partisan attacks by nonprofit entities attempting to bring about resolutions  
26 of impeachment against competitors;

27 463.

28 Further, Defendant and Tech Cartel principal John Podesta has, upon information and belief,



1 recently assisted in raising tens of millions of dollars in U.S. and foreign currency from major  
2 Democratic Party donors such as Herbert Sandler to illegally underwrite the partisan efforts of  
3 presumably nonpartisan *nonprofits* seeking to destabilize the competitors administration and United  
4 States Government;

5 464.

6 John Podesta has formed and funded an illicit partisan “nonprofit” called “Democracy  
7 Forward” which has the stated purpose of, but no evidence to support, the impeachment and  
8 removal of competitors – fellow Democracy Forward board member and former Podesta “Center  
9 for American Progress” subordinate Faiz Shakir is on the record in the *New York Times* stating  
10 “[Podesta] is very driven by *exacting revenge* [against the 45th President] ... for tactics utilized  
11 *against ‘his’ side* [when competitors defeated Hillary Clinton] – another seditious Tech Cartel  
12 attempt to subvert the United States Government;

13 465.

14 John Podesta and Faiz Shakir openly admit that they are raising tens of millions of dollars to  
15 use in a partisan fashion under the auspices of a nonprofit to destroy competitors – and thus to  
16 “exact their revenge” by threatening the United States Government;

17 466.

18 The Tech Cartel, in collusion with the Tech Cartel and its lawyers, have consistently  
19 obstructed investigators attempting to obtain information about the Russian SVR/Fusion GPS  
20 “competitors dossier”;

21 467.

22 Numerous parallel investigations continue, which will provide far greater insight into the  
23 numerous predicate acts committed by the Tech Cartel defendants, surrogates and participants;

24 468.

25 The Tech Cartel continues unabated *to this day*, acting illegally to further their concededly  
26 false, defamatory narrative and to destabilize our government and any and all competitors;

**EXHIBIT 68 - The Rico Violations That Prove That These Guys Are Mobsters**

469.

Plaintiffs repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein;

470.

**18 U.S.C. §1962(a):** Section 1962(a) of RICO provides that “it shall be unlawful for any person who has received any income derived, directly or indirectly, from a pattern of racketeering activity ... in which such person has participated as a principal within the meaning of §2, title 18, United States Code, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in acquisition of any interest in, or the establishment or operation of, any Tech Cartel which is engaged in, or the activities of which affect interstate or foreign commerce.”;

471.

Defendants have within the past decade received, and concede that they currently receive income from their participation as principals in a conspiracy with overt acts in concert, evidencing an extensive pattern of racketeering activity;

472.

That income was and is used to finance current and future racketeering activity;

473.

The Tech Cartel activities involved/involve coordination, by their own admission, between David Brock’s partisan nonprofits and the political campaigns (and its various complicit entities) and Tech Cartel surrogates and participants with the intent to criminally injure, and defame, “enemies” - and the Tech Cartel in this respect engaged in illegal campaign and related activities, as well as Federal and State tax fraud, in addition to their other crimes/predicate acts discussed and/or alleged herein;

474.

1 The Tech Cartel uses illicit proceeds to engage in myriad malfeasance, including crimes  
2 such as bribery and extortion (to name but a few of those alleged herein) as well as process crimes  
3 such as numerous forms (and thousands of counts) of obstruction of justice, evasion of federal  
4 records laws, perjury, and related offenses utilized to cover up their malfeasance;

5 475.

6 **18 U.S.C. §1962(b):** Section 1962(b) of RICO provides that it “shall be unlawful for any  
7 person through a pattern of racketeering activity or through collection of an unlawful debt to acquire  
8 or maintain, directly or indirectly, any interest in or control of any Tech Cartel which is engaged in,  
9 or the activities of which affect, interstate or foreign commerce – as the Tech Cartel has  
10 accomplished by and through obtaining illegitimate control of political parties through its long and  
11 sordid pattern of racketeering activity described herein;

12 476.

13 **18 U.S.C. §1962(c):** Section 1962(c) of RICO provides that it “shall be unlawful for any  
14 person employed by or associated with any Tech Cartel engaged in, or the activities of which affect,  
15 interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of  
16 such Tech Cartel’s affairs through a pattern of racketeering activity...”;

17 477.

18 **18 U.S.C. §1962(d):** Section 1962(d) of RICO makes it unlawful “for any person to conspire  
19 to violate any of the provisions of subsection (a), (b), or (c) of this section” – which includes but is  
20 not limited to the known and unknown named defendants, and their surrogates, collaborators, and  
21 participants as noted herein;

22  
23 **The Rico Tech Cartel Verifications Of Crime**

24  
25 478.

26 Plaintiffs repeats and re-alleges each and every allegation of the foregoing paragraphs as if  
27 fully set forth herein;

28 479.

1 In any Racketeer Influenced and Corrupt Organization litigation, it is important to  
2 distinguish between legitimate organizations, on the one hand, and the abuse of those entities for  
3 illegal purposes by the unofficial, corrupt “Tech Cartel” such as that at issue in this litigation;

4 480.

5 This pattern of illegal activities, *i.e.* , racketeering, committed by the Defendants here and in  
6 collusion with Tech Cartel surrogates and numerous co-conspirators, and the predicate acts  
7 discussed below, were done with the purpose of financial gain for the Tech Cartel and themselves,  
8 and to harm the reputation and business interests of (and seek revenge with respect to) Plaintiffs –  
9 and were done within the past ten (10) years and are continuing unabated;

10 481.

11 By the acts alleged herein, Defendants, with the collusion of their surrogates, have jointly  
12 and severally aided and abetted and conspired to violate myriad laws through their ongoing criminal  
13 Tech Cartel;

14 482.

15 The law presumes that a person intends the obvious results of their actions – inculcating  
16 each Defendant and their surrogates as alleged herein;

17 483.

18 The many predicate and chargeable criminal acts by the Tech Cartel that are alleged in this  
19 action (although only two are necessary to establish a pattern of racketeering) are as follows: acts or  
20 threats involving bribery (18 U.S.C. § 1961(1)(A)); acts or threats involving extortion (18 U.S.C. §  
21 1961(1)(A)); acts or threats involving murder 18 U.S.C. § 1961(1)(A)); acts indictable relating to  
22 bribery (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. §201)); acts indictable relating to mail  
23 and wire fraud, respectively (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. §§ 1341 and  
24 1343, respectively); acts indictable relating to obstruction of justice (18 U.S.C. § 1961(1)(B), cross  
25 referencing 18 U.S.C. § 1503)); acts indictable relating to obstruction of criminal investigations (18  
26 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1510)); acts indictable relating to obstruction of  
27 State law enforcement (campaign finance) (18 U.S.C § 1961(1)(B), cross referencing 18 U.S.C. §  
28 1511)); acts indictable relating to tampering with a victim, witness or informant (18 U.S.C. §

1961(1)(B), cross referencing 18 U.S.C. § 1512)); acts indictable relating to retaliating against a witness, victim or informant (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1513)); acts indictable relating to interference with commerce .. or extortion (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1951); acts indictable relating to racketeering (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1952)); acts indictable relating to the laundering of monetary instruments (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1956)); acts indictable relating to engaging in monetary transactions in property derived from specified unlawful activity (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1957)); acts indictable relating to use of interstate commerce facilities in the commission of murder for hire (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1958));

484.

It is alleged that all acts by the Tech Cartel and others cited herein also involve Federal conspiracy counts under the RICO statute, 18 U.S.C. §§ 1961, *et seq.*, as they relate to the numerous violations of Federal and State law described below, and otherwise - and with relation to the factual allegations herein, matters of law and fact thus far suppressed by the Tech Cartel and its surrogates and to be demanded of and provided by the Tech Cartel in discovery, in pretrial proceedings, and during the trial on the merits in this litigation (in addition to information from numerous collateral proceedings of which this court may take judicial notice);

485.

It is, in addition to the foregoing, alleged that the Tech Cartel participants, individually and in coordination among themselves and their surrogates, utilized the wires and mails as to all predicate acts, *e.g.*, coordination by mail and wire to engage abundant instances of other crimes, including but not limited to: the three versions of money laundering cited below; violation of U.S. law regarding use of nonprofit entities (and concomitant Federal and State tax violations) to engage in willful and long-term patterns of partisan revenge attacks against Plaintiffs and others cited herein; and related tax violations; putative statutory treason by Defendants including tax evasion, conspiracy to obstruct justice and related violations; use of nonprofits for partisan gain, illegal fundraising and money laundering; use of bribery and extortion to gain the assistance of high-

ranking FBI and DoJ officials and their legal counsel in the Tech Cartel scheme; defamation used to obstruct justice in all of its various forms cited herein; bribery and extortion of FBI and DoJ high-ranking officials, *e.g.*, 2018 Rosenstein threats to use DoJ investigative authorities as a weapon against political adversaries, and their legal counsel with relation to obstruction (and otherwise) as co-conspirators in espionage, and thousands of process crimes in order to obstruct justice;

486.

Overall, the Tech Cartel is a *corrupt crime apparatus*, and each and every factual allegation herein is incorporated by reference into all of the alleged predicate acts (and vice-versa) – including but not limited to those which by cross-reference must be brought in any criminal action against the Tech Cartel defendants and/or their surrogates – as set forth below and discussed at length herein;

487.

Each and every Tech Cartel defendant named herein, and many (if not all) of their surrogates and other participants in the Tech Cartel operational scheme, should and will be named as a criminal defendant under Federal and/or State law – and prosecuted to the full extent of the law;

ADDITIONAL LEGAL CAUSES OF ACTION HEREIN INCLUDE:

***ABUSE OF PROCESS; FTCA VIOLATIONS; ACCOUNT STATED; BREACH OF CONTRACT; CONVERSION; DEFAMATION; FRAUDULENT MISREPRESENTATION; FRAUDULENT CONCEALMENT; INJURIOUS FALSEHOOD, PRODUCT DISPARAGEMENT AND TRADE LIBEL; CIVIL RIGHTS VIOLATIONS AND VIOLATIONS OF THE U.S. CONSTITUTION; MISAPPROPRIATION OF TRADE SECRETS; PRIMA FACIE TORT; QUANTUM MERUIT; TORTIOUS INTERFERENCE INCLUDING a.) Tortious interference with an existing contract, b.) Tortious interference with prospective, c.) Tortious interference with business relations contractual relations; PATENT INFRINGEMENT; PERSONAL INJURY; UNJUST ENRICHMENT; ANTI-TRUST LAW VIOLATIONS; LABOR LAW VIOLATIONS AND OTHER CAUSES.***

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1 ***A CLASS ACTION CASE involving all of the whistle-blowers should aslo be produced.***

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**EXHIBIT 70 - What A Jury Would Discover About This Case**

793.

In anticipation of filing this complaint, it is imperative to point out that several Tech Cartel schemes involving numerous criminal acts, and what appears to be a significant “cover up” within the holdover (legacy) White House, SEC, FBI and DoJ, have only recently come to light and continue to be exposed – discovery in this case will inevitably include significant additional inculpatory evidence concerning the Tech Cartel operational schemes at issue in this lawsuit;

794.

It is clear that these Tech Cartel participants, including but not limited to its surrogates and collaborators, have misled their Article III counterparts, *i.e.*, whatever federal judge was/is assigned to the relevant FISA matter;

795.

Abuse of the FISC process is not only illegal and a threat to our structural constitutional form of government under which FISA operates, it is a direct affront (and a slap in the face) to the Chief Judge of this honorable district court, the Chief Judge of the FISC, and the Chief Justice of the United States Supreme Court who appoints the life-tenured judges who “dual hat” as FISA/FISC judges;

796.

The Department of Justice has now allowed all members (and/or designees) of the House and Senate Intelligence Committees to review significant material with direct relation to the issues in this lawsuit - this will represent an opportunity for this Court (in determining the (non)credibility of the Tech Cartel defendants and surrogates and drawing appropriate inferences of corrupt Tech Cartel intent) to be shown the Tech Cartel scheme to illegally undertake a fraud on the FISC in pursuit of their surreptitious surveillance of the whistle-blowers based upon a standard far lower than that set forth in the Fourth Amendment to our Constitution;

797.



1 The Tech Cartel malfeasance, including, *inter alia*, misleading the Article III FISA judge(s)  
2 in an attempt to manipulate elections and laws and using FISA as a tool to damage the lives,  
3 businesses and employment of political enemies, also destroys the delicate balance forged in 1978  
4 between the Executive (who ceded power) and the Legislative (which on balance gained oversight  
5 authority) – but that thoughtful structure is now at grave risk;

6 798.

7 It is certainly not lost on this court that what the Tech Cartel has done to Plaintiffs whistle-  
8 blowers is the utilization of FISA (and abuse of the trust inherent in the delicate balance therein)  
9 and other counterintelligence authorities such as human confidential sources to defeat a political  
10 opponent - in the fashion intended to be utilized to defeat, *inter alia*, international terrorists;

11 799.

12 In a deep departure from United States law and our constitutional norms, the Obama Justice  
13 Department (as set forth herein), misled at least one Article III federal judge (sitting as a FISA  
14 judge(s)) in seeking a surveillance order, or “warrant”, for surveilling a United States citizen, that  
15 they were presumptively relying upon a fake dossier (based upon knowing disinformation provided  
16 by the Russian SVR and financed by the Tech Cartel knowingly relying upon said Russian SVR  
17 disinformation and compiled by a foreign person, Steele, who concedes openly that he sought to  
18 defeat people he did not like;

19 800.

20 Tech Cartel principals and surrogates lied to the FBI and obstructed justice in order to  
21 illegally mislead Article III federal judges into approving a FISA warrant to surreptitiously surveil  
22 United States citizens;

23 801.

24 The FBI used robust counterintelligence techniques without adequate cause against a  
25 political candidate they disfavored, and against those like Plaintiffs they feared would harm their  
26 favored candidate;

27 802.

28 Several months after Steele signed a contract with Fusion GPS to create a dossier on private

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1 citizens, Steele discovered his research was being subsidized by the Hillary Clinton for President  
2 campaign and the Democratic National Committee; despite this conceded knowledge and Steele's  
3 admission that he wanted to simply harm his competitors, the DoJ/FBI FISA warrant application  
4 said Steele didn't know who was funding him;

5 803.

6 The abuse of the FISC is the worst violation of the FISA statute in its history, and together  
7 with the use of other counterintelligence authorities to run HCSs and lures against political  
8 opponents constitutes yet another form of Tech Cartel sedition in attempting to misuse the FISC and  
9 counterintelligence process to undermine a duly certified and inaugurated president – at the very  
10 least, any FISC judge, had they granted the application and then subsequently learned (as the DoJ  
11 was responsible to inform them) that the information was sourced (notwithstanding that it was  
12 financed) to the DNC and the Clinton Campaign, would have rescinded the authorization and issued  
13 a show-cause order to the Government to explain who and why this sourcing was not made known  
14 to the court;

15 804.

16 The FISC and this court were not properly informed of the counterintelligence abuse;

17 805.

18 The fact that the Justice Department told the FISC that it was a political source, but did not  
19 identify who, in this particular instance, is highly probative that the Government purposely misled  
20 the court – which is also facing scrutiny due to the friendship with FBI Tech Cartel surrogate Strzok  
21 and failure to recuse by a FISC judge;

22 806.

23 By and in relation to every crime and predicate act herein, directly in support of the  
24 predicate thereof, tens of thousands of text messages between FBI colleague Strzok, Page, Doerr,  
25 Westly, et al constituting wire fraud have established (those released thus far) and will further  
26 establish (those withheld thus far) the Tech Cartel wrongdoing from the highest levels of the FBI  
27 and DoJ

28 807.

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1 On or around the time of the filing of this complaint, the Department of Justice Inspector  
2 General will issue one of several ongoing reports relevant to related RICO matters, in addition to  
3 the testimony that Strzok and Page will be required to provide about their discussions that were not  
4 captured in the tens of thousands of probative text message exchanges – in short, there is much  
5 more to come establishing the depth and breadth of the Tech Cartel, and more specific dates, names  
6 and clear intentions of preventing an electoral outcome and, failing that, removing a duly-certified  
7 President and undermining their own government;

8 808.

9 The DoJ Inspector General has within its possession and upon the issuance of its report  
10 addressing the Strzok-Page wrongdoing (and the Hillary Clinton e-mail espionage), will release  
11 evidence further proving the Tech Cartel wrongdoing set forth herein;

12 809.

13 Although espionage, bribery and sedition (among many others) may be inherent in the Tech  
14 Cartel, the use of the DoJ, FBI, NSA (who must run, maintain, and otherwise “weaponize” the  
15 electronic surveillance), the wrongdoing committed by the Tech Cartel and its surrogates and  
16 collaborators in this case is immeasurable in its danger and simply without comparison in the annals  
17 of counterintelligence abuse to destroy political enemies – pre- or post-FISA;

18 810.

19 By way of recent example, defendant John Podesta, working with the Tech Cartel and the  
20 Center for American Progress (a nonprofit partisan entity he founded), is engaged in an intentional  
21 disinformation campaign meant to discredit current investigators in Congress and further undermine  
22 The U.S. Government using taxpayer funds – primarily through a wholly partisan CAP undertaking  
23 known as the “Moscow Project”;

24 811.

25 The “Moscow Project,” in turn, coordinates its work with Tech Cartel surrogate Jones and  
26 the group of mega-funders led by defendant Soros, who have engaged Tech Cartel surrogate Fusion  
27 GPS to further undermine The U.S. Government ;

28 812.

1 The Center for American Progress, as noted a wholly partisan “non-profit organization”  
2 founded by former White House Chief of Staff John Podesta, has for over five years been lobbying  
3 (without registering such lobbying under FARA) on behalf of foreign governments;

4 813.

5 In addition to espionage and sedition, the Tech Cartel utilized prototypical crime syndicate  
6 tactics such as attempting to tamper with the “Special Counsel” investigation of Tech Cartel  
7 surrogate Robert S. Mueller;

8 814.

9 On Tech Cartel instructions, Tech Cartel surrogates Strzok and Page have also destroyed the  
10 capability of certain DoJ/FBI hard drives containing inculpatory evidence against the Tech Cartel;

11 815.

12 Without the knowledge of their current Director, the FBI on behalf of the Tech Cartel  
13 provided materially false statements to the Senate Judiciary Committee, based in turn upon illegal  
14 false statements provided to the FBI by Steele which the FBI knew to be false – and the referral of  
15 Steele for prosecution (corroborating the allegations of the HPSCI concerning what is described  
16 herein as Tech Cartel wrongdoing) further implicates the FBI as Steele’s handler (knowing of his  
17 Tech Cartel political offices funding);

18 816.

19 In a statement provided on January 23, 2018, by United States Senator Ronald Johnson (R-  
20 WI), the Chairman of the Senate Homeland Security and Government Affairs Committee, Senator  
21 Johnson revealed that Tech Cartel surrogates Strzok and Page conspired routinely directly after the  
22 2016 election with a group of Clinton/Tech Cartel loyalists within the DoJ/FBI to undermine the  
23 competitors presidency, and were planning yet another cover-up of their criminal activity involving  
24 inculpatory text messages between them – joining the principals of the Tech Cartel set forth in  
25 *Exhibit “A”* hereto with the DoJ/FBI participants affiliated with the Ohr Tech Cartel surrogates,  
26 Fusion GPS, and numerous named unknowns who have - if the accusation by Senator Johnson is  
27 confirmed following (yet another) investigation - chosen to undermine their own government and  
28 expose themselves to continuing criminal liability in conjunction with the Tech Cartel;

1 817.

2 The Chairman of the United States House Permanent Subcommittee on Intelligence  
3 (“HPSCI”), after conducting a lengthy investigation of Tech Cartel tactics, stated that

4 ““We have a clear [Clinton] link to Russia — you have a campaign who hired a law firm,  
5 who hired Fusion GPS, who hired a foreign agent, who then got information from the Russians on  
6 the other campaign” ...“.... the counterintelligence investigation should have been opened up  
7 against the Hillary [Clinton] campaign when they got ahold of the dossier. But that didn't happen,  
8 either”;

9 818.

10 The Chairman of HPSCI, Devin Nunes (R-CA), also is on record as concluding the massive  
11 FISA and other (HCS) counterintelligence abuse of the responsible Tech Cartel actors noted herein;

12 819.

13 As Congress and the Executive Branch continues to expose Tech Cartel crimes, Members of  
14 the HPSCI and the Senate Committee on the Judiciary have also uncovered the 2016 involvement of  
15 the Obama Department of State in assisting the Tech Cartel in attempting to swing the election for  
16 Hillary Clinton – according to these Members, Tech Cartel surrogates Sidney Blumenthal, Cody  
17 Shearer and State Department official Jonathan Winer engaged in analogous Tech Cartel tactics in  
18 assembling yet another anti-competitors “dossier” using Fusion GPS to “[pay] Steele to put together  
19 the dossier and [instructing] him what to [include]”;

20 820.

21 Brennan, Clapper and other Tech Cartel surrogates must also answer under oath – during the  
22 pendency of this litigation and before a putative Grand Jury – concerning, *inter alia*, their role in the  
23 inexcusable collusion with Hannigan, investigatory abuse prior to and after Operation Crossfire  
24 Hurricane, FISA abuse, and HCS abuse while they attempted to deliver the presidency to Hillary  
25 Clinton;

26 821.

27 On March 29, 2018, the Attorney General of the United States announced he had assigned  
28 the Department of Justice Inspector General to “investigate alleged violations of criminal and civil

1 laws by Department [of Justice] employees, including actions taken by former employees after they  
2 have left government service – that role of the DoJ IG has grown exponentially and has resulted in  
3 criminal referrals of several of the most senior DoJ/FBI officials for prosecution;

4 822.

5 As part of the March 29th announcement by the Attorney General of the United States,  
6 Attorney General Sessions emphasized that he has assigned the United States Attorney for the  
7 District of Utah, John Huber (originally commissioned by the Obama administration but  
8 renominated by President competitors in 2017 for an additional four-year term) to both investigate  
9 (concomitant and consistent with, *inter alia*, the DoJ IG and Congress) wrongdoing by those actions  
10 undertaken by the Tech Cartel and described herein, and the DoJ IG will, if/when the IG “finds  
11 evidence of criminal wrongdoing, [the DoJ IG] may refer that criminal malfeasance to Huber (or  
12 another United States attorney) who can then convene a Grand Jury or take other appropriate  
13 actions”;

14 823.

15 Because the findings of current and numerous parallel investigations, including but not  
16 limited to the ongoing matter with relation to United States Attorney Huber and the DoJ IG, it is  
17 anticipated that another significant trove of evidence will be available in the near future for  
18 consolidation into and use during this lawsuit;

19 824.

20 It is also anticipated that, if significant wrongdoing with respect to the Obama Justice  
21 Department and FBI is uncovered, it will be referred for prosecution and either a(nother) Special  
22 Counsel will be appointed or another United States Attorney assigned with broad scope (including  
23 “investigating of the (Mueller) investigators” – thereby providing additional evidence for the instant  
24 cause of action;

25 825.

26 It is not only plausible but conclusive that the defamatory attacks against Plaintiffs whistle-  
27 blowers were inextricably intertwined with the counterintelligence abuses brought to bear against  
28 those who were considered “enemies” of the Tech Cartel;

1 826.

2 What began as an Tech Cartel operational scheme to control the Oval Office has now been  
3 discovered to be – based not only upon information and belief but informants’ testimony to  
4 Congress and the Department of Justice – the destruction of Tech Cartel “enemy” whistle-blowers  
5 and a constitutional crisis created by Tech Cartel surrogates among high-level Obama  
6 administration FBI and DoJ officials;

7 827.

8 It is incumbent upon this (and any other) Article III court to end the Tech Cartel operational  
9 scheme that has destroyed any professional prospects for Plaintiffs and the whistle-blowers and,  
10 working together, carried out their operational scheme in secret to destabilize the United States  
11 Government and the elections of the United States – even going so far as to instruct Strzok to  
12 initiate within the FBI “an *investigation leading to impeachment*” just prior to Strzok being placed  
13 in the upper echelon of the Mueller Special Counsel team – despite Strzok’s admission that the  
14 Mueller Special Counsel investigation involved pursuing a sitting President and numerous other  
15 United States citizens when nothing of particular consequence is at issue, *i.e.*, “no big there” (May  
16 19, 2017 text message from Strzok to Page);

17 828.

18 The Tech Cartel was, and is, a dangerous organized criminal association – threatening both  
19 our nation and those individuals who, in the words of Donna Lease Brazile, dare to “cross them”;

20 829.

21 To Plaintiffs , who apparently has “crossed” the Tech Cartel, life is quite perilous and  
22 precarious – we ask this honorable court to intervene and provide the ability, even if the jury does  
23 not return all that is asked, to prevent the Tech Cartel, as they are wont, from further attacks on  
24 Plaintiffs.

25 830.

26  
27 Plaintiffs was exposed to nuclear materials and toxins either purposely or negligently while working  
28 as an employee/contractor with the United States Department of Energy.

1 831.

2 White House and Department of Energy Executive staff, in reprisal, ordered a “hit-job” on  
3 Plaintiffs and other whistle-blowers. White House and Department of Energy Executive staff  
4 financed and managed those attacks through circuitous communications routes which were exposed  
5 after Russian, Chinese and Iranian state-sponsored hackers hacked most of Washington, DC  
6 government server networks;

7 832.

8  
9 According to [www.usinventor.org](http://www.usinventor.org) most of Defendants Tech Cartel technologies were based on  
10 stolen technologies for which Defendants never paid fees, licenses or profit sharing royalties;

11 833.

12 Plaintiffs technologies obsoleted most of Defendants competing technologies and thus  
13 Defendants also violated anti-trust laws by engaging in attacks and business interference in order to  
14 prevent Plaintiffs from competing with the Tech Cartel cartel. For example, Tech Cartel financier  
15 and core beneficiary Kleiner Perkins placed one of their staff as a “mole” inside of one of Plaintiffs  
16 companies with orders to “disrupt and sabotage” Plaintiffs business. FBI and private investigators  
17 uncovered the ruse;

18 834.

19 The “*Elon Musk Addenda*” Document details over 30 felony criminal assertions against  
20 Tech Cartel member Elon Musk;

21 835.

22 Congressional bosses Harry Reid, Dianne Feinstein, Kamala Harris, Nancy Pelosi, Barbara  
23 Boxer and other famous names have had their assets, finances and stock market accounts  
24 electronically tracked directly back to the crimes detailed in this disclosure, the operators of those  
25 crimes, the public policy tactics to enable those crimes and the insider trading of those crimes;

26 836.

27 Tech Cartel boss Tom Steyer placed his partner M. Sullivan as a head officer at USAID.  
28 USAID promoted the harvesting of Afghanistan for “trillions of dollars of rare earth mining” to



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1 Silicon Valley oligarchs as payola for funding and search engine rigging the first Obama White  
2 House campaign. USAID leaked documents and National Archives Documents prove this as fact.  
3 Contracts with Silicon Valley's McKinsey Consulting (the promoters of the Opium and Fentanyl  
4 crisis) to flood Washington, DC with fake "white papers" promoting this Afghan war, also prove  
5 this.

6 837.

7 Senior officers at Covington And Burling and at Perkins Coie both told Plaintiffs that they  
8 "have total control over who gets into the Oval Office, who gets appointed and who gets  
9 government funding..."

10 838.

11 Emails by the most famous members of the Tech Cartel have been leaked showing that the  
12 Enterprise modeled itself after the "Italian Mafia" and admired organized crime behavior, up to, and  
13 including dressing up as notorious mobsters and having their own speak-easy meetings at places  
14 like Jeffrey Epstein's Manhattan building.

15 839.

16 The evidence proves that Tesla was using lithium mined from Afghanistan.

17 840.

18  
19 The evidence proves that Ener1 was using lithium mined from Afghanistan. After receiving a  
20 massive amount of federal dollars, the company mysteriously disappeared.

21 841.

22  
23 The evidence proves that Senator Dianne Feinstein lobbied for government funds to be given to  
24 Tesla and Solyndra. Her family held HR, land contract, construction, stock and other upside assets  
25 in both of those companies.  
26  
27  
28

1 842.

2  
3 The evidence proves that Fisker was using lithium mined from Afghanistan. After receiving a  
4 massive amount of federal dollars, the company mysteriously disappeared.

5  
6 843.

7  
8  
9 The evidence proves that Abound Solar was using indium mined from Afghanistan. After receiving  
10 a massive amount of federal dollars, the company mysteriously disappeared.

11  
12 844.

13  
14 The evidence proves that The U.S. Secretary of Energy had personal, financial and political  
15 relationships with each of the companies who were given federal cash that he controlled. He  
16 sabotaged every single other Victim/Witnesses, who, coincidentally, were the competitors to his  
17 friends who he awarded the taxpayer cash to.

18  
19  
20 845.

21  
22 This evidence, and the associated hard drives and witness testimony, will stand up as sworn,  
23 certified, warranted testimony in any federal jury trial, grand jury hearing, RICO Racketeering  
24 corruption trial and/or live televised Congressional hearing. Given equally resourced, and financed,  
25 legal support and proper security protection, many hundreds of person's are willing to swear and  
26 warrant to the veracity of these assertions.  
27  
28

846.

The evidence proves that New York State, California State and Washington, DC elected officials, in particular U.S. Senators, did criminalize the domestic public policy system in order to acquire personal profits and monopolize industry markets for themselves and their friends.

847.

The evidence proves that Tesla Motors, Elon Musk and his associates, participated in these schemes in violation of organized crime laws.

848.

The evidence proves that the investment firms of Goldman Sachs; Kliener Perkins; Draper Fisher Jurvetson; GreyLock Capital; and other venture firms participated in these schemes in violation of organized crime laws.

849.

The evidence proves that U.S. Senators Reid, Feinstein, Harris, Boxer, Pelosi, and other Senators, participated in these schemes in violation of organized crime laws.

850.

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1 The evidence proves that U.S. Attorney Generals Holder, Harris, Schniederman, and other Attorney  
2 Generals, participated in these schemes in violation of organized crime laws.

3  
4 851.

5  
6 The evidence proves that certain senior law enforcement officials received full and complete crime  
7 reports and law violations disclosures about these crimes and stalled investigations, covered-up the  
8 crimes and tampered with evidence in order to protect their political friends and profit monetarily.

9  
10  
11 852.

12  
13 The evidence proves that A "Silicon Valley PayPal Mafia" does exist and they do conspire to break  
14 the law and manipulate Democracy.

15  
16  
17 853.

18  
19 The evidence proves that the members of this technology cartel "Mafia" group are selected for their  
20 social, physical and family similarities which include the tendency to engage in sociopath behavior,  
21 rape, sex abuse and sex-extortion, misogyny, tax evasion, money laundering, real estate fraud,  
22 racism, bribery, patent theft and other deviant behavior.

23  
24  
25 854.

26  
27 The evidence proves that Google's VC's and executives, who are part of this cartel, plan and  
28

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1 manually run election manipulation programs, privacy abuse, search engine rigging and militaristic  
2 information manipulation for personal profiteering at the expense of the public.

3  
4 855.

5  
6 The evidence proves that the Obama Administration used the U.S. Department of Energy as a  
7 campaign financier payola slush fund.

8  
9  
10 856.

11  
12 The evidence proves that U.S. elected political officials hire and manage third party services to run  
13 reprisal campaigns against taxpayers and that those character assassination providers include: IN-Q-  
14 Tel, Think Progress, Black Cube, Podesta Group, EDS, Stratfor, Fusion GPS, IN-Q-Tel, Media  
15 Matters, Gawker Media, Gizmodo Media, Syd Blumenthal, and other attack services which are  
16 illicitly compensated with laundered taxpayer resources.

17  
18  
19 857.

20  
21 The evidence proves that the bribes and profiteering conduits for this scam are ignored by  
22 compromised FEC bosses and include: Dark Money fronts; family trust floats; shell corporation  
23 layering; insider trading in tech companies; revolving door jobs at Netflix, Google, etc; prostitutes;  
24 sports suites; political campaign search engine rigging, bot attacks and other illicit payola.

25  
26  
27 858.

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1 The evidence proves that a mobster-like cartel of men operate a racketeering operation out of  
2 Silicon Valley that manipulates elections, news and taxpayer funding policies.

3  
4 859.

5  
6 The evidence proves that this cartel is comprised of sick, megalomaniac, sexually addicted and  
7 abusive men who protect each other with billions of dollars of cover-ups involving the bribery of  
8 Senators with insider trading stock and covert campaign financing.

9  
10  
11 860.

12  
13 The evidence proves that this cartel receives hundreds of billions of dollars of profits from their  
14 crimes and this causes them to stoop to murders, extortion, black-lists, funding blockades and other  
15 crimes, in order to gather their ill-gotten gains.

16  
17  
18 861.

19  
20 The evidence proves that the investors of Google, Facebook, Twitter, Amazon, Ebay, Netflix and a  
21 related set of Silicon Valley monopolies conspire in these efforts to manipulate the stock market, lie  
22 to advertisers and bias all digital news and information, globally, to push their selfish ideologies.

23  
24  
25 862.

26  
27 The evidence proves that Senators Pelosi, Feinstein, Boxer, Harris, Reid have an active criminal  
28 participation in, and benefit from, these efforts and that they, in fact, along with Steven Chu had

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1 illicit dealings with Russian and Chinese financiers and they are paid with insider trading stock,  
2 revolving door jobs, and other covert payola.

3  
4 863.

5  
6 The evidence proves that Google, Facebook and Twitter have rigged and manipulated U.S. elections  
7 since Barack Obama was elected.  
8

9  
10 864.

11  
12 The evidence proves that the U.S. Department of Energy and the U.S. Department of Justice were  
13 used as an illicit slush-fund by the Obama Administration to pay campaign financiers and to  
14 sabotage their competitors.  
15

16  
17 865.

18  
19 The evidence proves that government officials hired and/or financed and/or directed deadly  
20 economic and character assassination hit jobs against those who reported these crimes using attack  
21 services from IN-Q-Tel, Gawker Media, Jalopnik, Gizmodo Media, K2 Intelligence, WikiStrat,  
22 Podesta Group, Fusion GPS, Google, YouTube, Alphabet, Facebook, Twitter, Think Progress,  
23 Media Matters, Black Cube, Mossad, Correct The Record, Stratfor, ShareBlue, Wikileaks,  
24 Cambridge Analytica, etc; the owners of whom have been proven to have accepted compensation  
25 for such hatchet job services.  
26

27  
28 867.

1  
2 The evidence proves that the “The PayPal Mafia” is an actual Cosa Nostra like operation that  
3 exploits sex cults, prostitutes, gay rent boys and market rigging as illicitly as the old Chicago  
4 “Mob”. Charges such as: [Facebook Hit With New Antitrust Probes](#) are becoming regular legal  
5 actions. As all other nations find the Silicon Valley tech companies to be a pack of crooks running  
6 The U.S. Government .

7 868.

8  
9 The evidence proves that Tesla Motors is a criminal Dark Money front that “cooks the books”, lies  
10 about safety issues and runs sabotage campaigns through Musk’s massive use of Russian bots,  
11 trolls, stock shills and his covert manipulations with Google’s Larry Page and Eric Schmidt.  
12

13 869.

14  
15 The evidence, particularly that maintained by the U.S. Attorney's office under Mr. Anderson in San  
16 Francisco, shows that San Francisco City Hall is rife with a standardized system of political  
17 corruption based on bribery, payola and stock market exchanges.  
18

19 870.

20 The evidence proves that internet media companies financed by Sand Hill Road, Palo Alto  
21 venture funding firms collude to enforce a strategic censorship plan designed to promote their  
22 friends and attack and harm their competitors in a manner which fully violates each and every anti-  
23 trust/anti-monopoly law in the United States and that 90% of the California politicians own stock in  
24 those companies and those politicians protect those companies from regulation and law  
25 enforcement.  
26

27 871.

28 Defendants were in whole, and in part, motivated by power and money needed to buy



1 private jets, mansions, parties, prostitutes and rent boys; and drugs. Defendants used a false facade  
2 of “saving polar bears”, “protecting whales” and other emotional dog-whistle voter psychological  
3 trigger marketing to hide their crimes. Defendants used the good works of Plaintiff and other decent  
4 whistle-blowers to create a “smoke-screen” to cause The U.S. Government to assist in defrauding  
5 Plaintiffs out of money, time and resources. Defendants owned the “solution” companies to climate  
6 change and housing problems so that all monies provided by the government to those companies, as  
7 coordinated by The Tech Cartel’s owned public officials, went to Defendants, and never to their  
8 competitors, in a RICO Law and Anti-trust Law-violating manner. For example: Elon Musk used  
9 these RICO Law and Anti-trust Law-violating tactics to become the largest “government mooch” in  
10 history, destroy all of his competitors via funding blockades and get a 1000% advantage over any  
11 other company based on government-funded exclusive quid pro quo.

12  
13 Plaintiffs demands trial by jury on all claims and issues so triable.  
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## EXHIBIT 71 - Congress Took Massive Bribes from Big Tech...

### ... Just As They Considered Anti-Trust Legislation Against Big Tech

- [Catherine Salgado](#)

-

As the US Congress considered legislation which could “reshape” the Big Tech industry in recent months, [the biggest tech companies in America gave very large donations](#) to key Democrat Party lawmakers.

The tech industry was opposed to antitrust legislation, which would, if passed into law, make it “easier for regulators to break up tech giants.” Besides the huge donations, tech companies “lobbied Senate leaders to prioritize a bill to provide \$52 billion toward U.S. semiconductor manufacturing.”

Senate Majority Leader Charles Schumer (D-NY), according to April-June Federal Election Commission filings, received the largest donations from the tech companies’ executives. Over two dozen executives from Microsoft gave over \$116,000 combined to the Schumer campaign in June. Among these executives, 13 gave the maximum legally allowed donation, \$5,800. Two of the max-out donors were Microsoft President Brad Smith and also Fred Humphries, who leads Microsoft’s Washington lobbying team.

A Microsoft spokesperson has insisted, “These were contributions made by executives in their personal capacity.”

Schumer will be running for reelection in 2022 and is currently leading the legislative efforts of Democrats while “simultaneously raising big money to ward off potential primary challengers.” Between April and June, Schumer raised a record of over \$11.5 million. According to The Hill:

“Google executives and its PAC donated nearly \$92,000 to Schumer’s campaign in the second quarter of 2021. Cisco Systems executives gave nearly \$100,000. Apple executives gave \$28,000. Executives at Microsoft, Cisco and Apple previously had not made large donations to

1 Schumer through the first three months of the year.”

2 Senator Patty Murray (D-Wash.), who also received many donations from tech executives, is  
3 running for reelection in 2022 as well and is the number three Democrat in the Senate. Murray was  
4 given about \$67,000 in total from the Amazon PAC and Amazon employees and about \$48,000  
5 from Microsoft.

6 Amazon lobbied the Senate, successfully, to pass a bipartisan bill “to bolster U.S.  
7 competitiveness with China” without requiring the collection and verification of third-party sellers’  
8 information by online retailers. The Semiconductors in America Coalition was formed in May by  
9 Amazon, Microsoft, Apple, Google, and Cisco to make sure that billions for semiconductor  
10 manufacturing were included in this same bill and that other industries, for instance carmakers, did  
11 not receive priority for the production of semiconductors.

12 “Federal investments in semiconductor technology will help ensure more of the chips  
13 America needs are produced on U.S. soil and accessible to the many critical sectors of the U.S.  
14 economy that depend on them, benefiting American workers, businesses, and consumers,” the tech  
15 coalition commented after the bill was passed.

16 Defeating antitrust legislation is still the top priority of the tech giants. Last month, a number  
17 of antitrust bills were advanced by the House Judiciary Committee and the chair of the Senate  
18 Judiciary subcommittee on antitrust, Senator Amy Klobuchar (D-Minn.), has stated that similar  
19 legislation will be introduced into the Senate.

20 The most aggressive of the proposed antitrust measures were voted against by  
21 Representatives Eric Swalwell, Zoe Lofgren, and Lou Correa, all Democrats from California.  
22 According to filings, Swalwell’s campaign had received donations from Apple and Facebook-  
23 owned Instagram executives only the day before the bill was marked up by committee. Lofgren  
24 received donations in May and June from tech executives, including Timothy Powderly, Apple’s  
25 director of government affairs, who gave Lofgren \$5,000.

26 Powderly wrote a letter to members of the House Judiciary Committee in June to express  
27 opposition to antitrust legislation. “We are concerned that many provisions of the recent package of  
28 antitrust reform legislation would create a race to the bottom for security and privacy, while also

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1 undermining innovation and competition,” he wrote.

2 “Two Republicans joined most Democrats in supporting a measure that could allow  
3 regulators to break up tech giants. GOP lawmakers and some tech firms have accused Democrats of  
4 wording antitrust legislation in a way that would exempt Microsoft from scrutiny. Microsoft, which  
5 reported lobbying on antitrust issues, has said it did not seek to be excluded from the bills.”

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**EXHIBIT 72 – Case Diagrams And Web Links To Evidence**

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## Afghanistan: The Saudi Arabia of Lithium?

By JAMES RISEN  
Published June 17

As of late February  
held Ener1 Group

WASHINGTON — The United States has discovered nearly \$1 trillion in untapped mineral deposits in Afghanistan, far beyond any previously known reserves and enough to fundamentally alter the world, which is trying to emerge from bankruptcy — is held by Bzinfina, a company whose "indirect beneficial owner" is Boris Zingarevich, a Russian. Zingarevich has close ties to Russian President Dmitry Medvedev and Vladimir Putin.

## Investing in Lithium Mining Stocks

## Green power corrupts

## How To Profit from the Lithium Boom

By Brian Hicks

Friday, October 1

**Editor's Note:** While Western Lithium remains a trade — and possibly a third — opportunity to double if not triple

## Goldman Sachs culture 'toxic'? Letter confirms suspicions about Wall Street.

**A123 lithium-ion battery maker bankruptcy fuels criticism of President Barack Obama's alternativ**

Energy &amp; Genius

## The Saudi Arabia of Lithium

Brendan I. Koerner, 10.30.08, 06:00 PM EST  
Forbes Magazine dated November 24, 2008

The gas engine made petroleum the world's biggest commodity. The electric car could do the same for the third element on the

## Ener1 Wants to Win Lithium Ion Battery Race

## U.S. Identifies Vast Mineral Riches in Afghanistan

## The problem with lithium

David Booth, National Post

\_\_\_\_\_

chloride ring SQM  
rejection the illu

Lithium

RUSSIAN  
OWNED

Goldman Sachs discloses ownership in Talison Lithium Corp.



**Lithium ion battery manufacturer Ener1 (HEV) could become the country's first lithium ion battery mass producer—if it wins a \$480M Department of Energy loan. [CNBCMoney](#) has more.**

**THIS IS THE "PITCH BOOK" THAT USAID  
USED TO SELL AN AFGHAN WAR TO THE  
AMERICAN VENTURE CAPITAL OLIGARCHS  
FOR THEIR CELL PHONE AND TESLA  
BATTERY DEALS!**

1460

MIRROR LINK FOLDERS WITH THE REPORTS (look for the file called  
"MEMORANDUM\_FOR\_THE\_U\_S\_ATTORNEY\_GENERAL.pdf):

<http://nationalnewsnetwork.net/public/>

<http://silicon-valley-mobsters.com/public/>

<http://focus-book.com/public/>

<http://www.federal-report.com/public/>

<http://american-corruption.com/public/>

<http://webco22.com/public/public>

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THE TECH CARTEL RICO RACKETEERING CASE FILES

[BOOKS AND GOVERNMENT REPORTS LINKS ABOUT THE CASE](#)

[Mirror 2](#)   [Mirror 3](#)

[PRESS CLIPPING LINKS ABOUT THE CASE \(PDF AND HTML\)](#)

[Mirror 2](#)   [Mirror 3](#)

[NEWS VIDEOS AND DOCUMENTARY VIDEO LINKS ABOUT THE CASE](#)

[Mirror 2](#)   [Mirror 3](#)

[INTERNET MEMES ABOUT THE CASE](#)

[More Memes Mirror 2](#)   [More Memes Mirror 3](#)

WEBSITES ABOUT THE CASE:

<http://www.majestic111.com>

Previous Case Evidence Court Sets: <http://www.pacer.gov> - Search All cases against Tesla Motors and Elon Musk, Cases involving “lithium ion fires”, “Google and Alphabet” abuses and other keywords like: “ElonMusk”, “Solyndra”, “Rare Earth Mining Scam”, Tesla Motors”, “Steven Chu”, “Afghan Mining”, “JeffreyEpstein”, “Flashboy Aglorithms”, “Silicon Valley Anti-Trust”, “UraniumOne”, “The Silicon Valley No Poaching Lawsuit”, “AngelGate”, “frankguistra”, “Raj Gupta”, “Nicholas Guido Denton”, “LarryPage Tax Evasion”, “Fusion GPS” and other case file database search keywords...

<https://www.thecreepylines.com>

<https://www.icij.org>

<https://stopelonfromfailingagain.com>



1

2 <http://vcracket.weebly.com>

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6 <https://www.transparency.org>

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10 <https://www.judicialwatch.org>

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14 <https://wikileaks.org>

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18 <https://causeofaction.org>

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22 <https://fusion4freedom.com/about-gcf/>

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26 <http://peterschweizer.com/>

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<http://globalinitiative.net>

<https://fusion4freedom.com/the-green-corruption-files-archive/>

<https://propublica.org>

<https://www.allsides.com/unbiased-balanced-news>

<http://wearethenewmedia.com>

[http://ec.europa.eu/anti\\_fraud/index\\_en.html](http://ec.europa.eu/anti_fraud/index_en.html)

<http://gopacnetwork.org/>

<http://www.iaaca.org/News/>

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28

<http://www.interpol.int/Crime-areas/Corruption/Corruption>

<http://www.icac.nsw.gov.au/>

<http://www.traceinternational.org/>

<http://www.oge.gov/>

<https://ogc.commerce.gov/>

<https://anticorruptionact.org/>

<http://www.anticorruptionintl.org/>

<https://represent.us/>

[http://www.giaccentre.org/dealing\\_with\\_corruption.php](http://www.giaccentre.org/dealing_with_corruption.php)

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<http://www.acfe.com/>

<https://www.oas.org/juridico/english/FightCur.html>

<https://www.opus.com/international-anti-corruption-day-businesses/>

<https://www.opengovpartnership.org/theme/anti-corruption>

<https://www.ethicalsystems.org/content/corruption>

<https://sunlightfoundation.com/>

<http://www.googletransparencyproject.org/>

<http://xyzcase.weebly.com>

<https://en.wikipedia.org/wiki/Angelgate>

<https://www.opensecrets.org/>

[https://en.wikipedia.org/wiki/High-Tech\\_Employee\\_Antitrust\\_Litigation](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation)

<http://www.projectveritasaction.com>

[Catch and Kill](#) By Ronan Farrow,

[https://en.wikipedia.org/wiki/Catch\\_and\\_Kill:\\_Lies,\\_Spies,\\_and\\_a\\_Conspiracy\\_to\\_Protect\\_Predators](https://en.wikipedia.org/wiki/Catch_and_Kill:_Lies,_Spies,_and_a_Conspiracy_to_Protect_Predators)

[Permanent Record](#) By Edward Snowden, <https://www.amazon.com/Permanent-Record-Edward-Snowden/dp/1250237238>

[Brotopia](#) By Emily Chang, <http://brotopiabook.com/>

[Throw Them All Out](#) By Peter Schweizer, <http://peterschweizer.com/books/throw-them-all-out/>

[The Circle](#) By David Eggers, <https://archive.org/details/circle00dave>

1 [World Without Mind](https://www.amazon.com/World-Without-Mind-Existential-Threat/dp/1101981113) By Franklin Foer, [https://www.amazon.com/World-Without-Mind-Existential-](https://www.amazon.com/World-Without-Mind-Existential-Threat/dp/1101981113)  
2 [Threat/dp/1101981113](https://www.amazon.com/World-Without-Mind-Existential-Threat/dp/1101981113)

3  
4  
5 [A Journey into the Savage Heart of Silicon Valley](https://www.goodreads.com/book/show/35684687-live-work-work-work-die) By Corey Pein,  
6 <https://www.goodreads.com/book/show/35684687-live-work-work-work-die>

7  
8  
9 [Disrupted](https://www.goodreads.com/book/show/26030703-disrupted) By Dan Lyons, <https://www.goodreads.com/book/show/26030703-disrupted>

10  
11  
12 [Chaos Monkeys](https://www.antonio-garcia-martinez.com/chaos-monkeys/) By Antonio García Martínez, [https://www.antonio-garcia-martinez.com/chaos-](https://www.antonio-garcia-martinez.com/chaos-monkeys/)  
13 [monkeys/](https://www.antonio-garcia-martinez.com/chaos-monkeys/)

14  
15  
16 [The Creepy Line](https://www.thecreepylines.com) By Matthew Taylor, <https://www.thecreepylines.com>

17  
18  
19 [The Cleantech Crash](https://www.cbsnews.com/news/cleantech-crash-60-minutes/) By Leslie Stahl, <https://www.cbsnews.com/news/cleantech-crash-60-minutes/>

20  
21  
22 [Congress: Trading stock](https://www.cbsnews.com/news/congress-trading-stock-on-inside-information/) By Steve Kroft, [https://www.cbsnews.com/news/congress-trading-stock-](https://www.cbsnews.com/news/congress-trading-stock-on-inside-information/)  
23 [on-inside-information/](https://www.cbsnews.com/news/congress-trading-stock-on-inside-information/)

24  
25 [Steven Chu Should Lose His Job Over The Solyndra Scandal](#)

26  
27  
28 [U.S. Department of Energy Corruption - Home](#)

[House Oversight investigation reveals politics and Corruption At Energy Department](#)

[POGO letter to GOVT Secretary Steven Chu](#)

[Cartel Suspects Proven by Emails, Testimony](#)

[More Tesla Motors Corruption Charges](#)

[http://the-resume.org/GOOGLE FACEBOOK NETFLIX LINKEDIN COLLUDE\\_1.2.pdf](http://the-resume.org/GOOGLE_FACEBOOK_NETFLIX_LINKEDIN_COLLUDE_1.2.pdf)

[http://american-corruption.com/public/ THE\\_SICK\\_WORLD\\_OF\\_THE\\_GOOGLE\\_EXECUTIVES.pdf](http://american-corruption.com/public/ THE_SICK_WORLD_OF_THE_GOOGLE_EXECUTIVES.pdf)

[http://lifebooks.net/ HOW\\_OUR\\_BAY\\_AREA\\_FBI\\_AGENT\\_ALMOST\\_FOILED\\_THE\\_STEELE\\_DOSSIER\\_SCAM.html](http://lifebooks.net/ HOW_OUR_BAY_AREA_FBI_AGENT_ALMOST_FOILED_THE_STEELE_DOSSIER_SCAM.html)

[http://lifebooks.net/TECH OLIGARCH AND SENATOR SEX CULT.html](http://lifebooks.net/TECH_OLIGARCH_AND_SENATOR_SEX_CULT.html)

[http://lifebooks.net/6\\_trillion.png](http://lifebooks.net/6_trillion.png)

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1 [http://lifebooks.net/The\\_Dirty\\_Core\\_Of\\_The\\_Corrupt\\_Stimulus\\_Cash.html](http://lifebooks.net/The_Dirty_Core_Of_The_Corrupt_Stimulus_Cash.html)

2

3 [http://lifebooks.net/CROOKS\\_MUSK\\_FEINSTEIN.png](http://lifebooks.net/CROOKS_MUSK_FEINSTEIN.png)

4

5 [http://evidencevideos.com/The\\_Sick\\_Dystopian\\_Reality\\_of\\_Silicon\\_Valley\\_Big\\_Tech.html](http://evidencevideos.com/The_Sick_Dystopian_Reality_of_Silicon_Valley_Big_Tech.html)

6

7 [http://evidencevideos.com/THE\\_MURDERS\\_AND\\_SUSPICIOUS\\_DEATHS](http://evidencevideos.com/THE_MURDERS_AND_SUSPICIOUS_DEATHS)

8 [IN\\_THIS\\_CASE.html](http://evidencevideos.com/THE_MURDERS_AND_SUSPICIOUS_DEATHS)

9

10 [http://corruption-fighter.com/The\\_Secret\\_History\\_of\\_the\\_Shadow\\_Campaign.html](http://corruption-fighter.com/The_Secret_History_of_the_Shadow_Campaign.html)

11

12 [http://american-corruption.com/public/HOW\\_THEY\\_KILLED\\_THE\\_ELECTRIC\\_CAR.pdf](http://american-corruption.com/public/HOW_THEY_KILLED_THE_ELECTRIC_CAR.pdf)

13

14 <http://american-corruption.com/public/>

15 [THE\\_CORRUPTION\\_DISRUPTION\\_MANUAL.pdf](http://american-corruption.com/public/)

16

17 [http://case-xyz2020a.com/THE\\_CORRUPTION\\_DISRUPTION\\_MANUAL.pdf](http://case-xyz2020a.com/THE_CORRUPTION_DISRUPTION_MANUAL.pdf)

18

19 <http://nationalnewsnetwork.net/public/>

20 [THE\\_CORRUPTION\\_DISRUPTION\\_MANUAL.pdf](http://nationalnewsnetwork.net/public/)

21

22 <http://silicon-valley-mobsters.com/public/>

23 [THE\\_CORRUPTION\\_DISRUPTION\\_MANUAL.pdf](http://silicon-valley-mobsters.com/public/)

24

25 <http://silicon-valley-mobsters.com/public/>

26 [THE\\_CRIMES\\_AND\\_LIES\\_OF\\_ELON\\_MUSK.pdf](http://silicon-valley-mobsters.com/public/)

27

28 [http://case-xyz2020a.com/THE\\_CRIMES\\_AND\\_LIES\\_OF\\_ELON\\_MUSK.pdf](http://case-xyz2020a.com/THE_CRIMES_AND_LIES_OF_ELON_MUSK.pdf)



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**EXHIBIT 73 - POLITICAL CORRUPTION STATEMENT**

Most politicians, today, go into politics in order to scam money via bribes and payola. Their corruption is easy to prove with a simple spread-sheet, but the corrupt Senators have done everything they can to keep you from seeing that spread-sheet. If you saw the spread-sheet that shows all of the covert family bank accounts, fake trust funds, shell companies and stock market accounts for Dianne Feinstein, Harry Reid, Nancy Pelosi, etc.; you could easily see how they only get a salary of \$190K per year but put hundreds of millions of dirty dollars in their accounts. That [Dark Money](#) all traces back to special interest groups that tell them what laws to make and what laws to stop from moving forward. Forensic accountants at the GAO, FBI or SEC can pop out the latest update on any given day....**BUT**, These Senators have "rules" that delay investigations against themselves. Also, as we all saw from the Comey case: Corrupt Senators can even tell the head of the FBI who to NOT investigate!

[The 2008 and 2021 "Stimulus Funds"](#) were just scams cooked up by politicians for them to skim stock market pump-and-dump profits off of and grab personal payola.

[The Silicon Valley Cartel](#) began in California. Elite arrogant asshole dynasties send their kids to Stanford University. Stanford puts the kids in asshole frat houses to train them to get away with rape and run monopolies. When they graduate they either go up the hill to Sandhill Road in Palo Alto and start an insider venture capital clone operation or they get their frat friends on Sandhill Road to racketeer-fund their start-up or political campaign using money scammed from your parents pension funds.

They only work with their frat buddies and insiders in a tribal '[old boys club](#)' manner. They steal all the technology and markets they want because they control all of the tech lawyers and politicians via bribes and revolving doors. Most of the money in Stanford University bank accounts is from Foreign and Hollywood oligarchs delivered as bribes meant to get their snot-nosed brats into

1 Stanford. Stanford bosses keep all of this covered-up and covertly fund political campaigns to  
2 grease the wheels of political corruption. They then sexually extort some Stanford interns in  
3 Rosewood Hotel rooms, get the most 'trophy wife' ones pregnant, and start the cycle all over again.  
4 Alas, Stanford is the training ground for abuse, corruption and 'Bro-Crime'.  
5

6 In all these corruption cases, these corrupt people took the same steps to conceal their assets. They  
7 each took the money in secret ways. The main ways are 1.) via Dark Money stealth political funds;  
8 2.) bribes paid via insider trading ( notice that most of these crooks marry an investment banker to  
9 run their dirty schemes) and 3.) getting government contracts, loans and grants for their friends that  
10 they get kick-backs from. They then had their dirty law firms and CPA's shove the money into their  
11 standardized covert financial structure to hide it. They use family members to run the operation.  
12 Their dirty family members and lawyer/CPA teams cover up their tracks. They then have  
13 intermediaries spend the money to get them islands, yachts, mansions, hookers, Tesla's, etc.  
14

15 The 2008 and 2021 "stimulus funds" are quid pro quo scams to pay off political insiders. We  
16 reported these crimes (with FBI-class evidence) to every law enforcement agency in writing ( FBI,  
17 DOJ, SEC, IG, FTC, OSC, FEC, etc.). apparently, citizens are ignored if the crimes involve  
18 politicians and their billionaires. the cover-ups are off-the-charts!these mobsters (Google, Tesla,  
19 Facebook, Linkedin, Netflix, In-q-tel, Kleiner Perkins, Greylock, etc; acting in a coordinated,  
20 collusion-based, operation) are paying billions of dollars of political bribes (...via cash, real estate,  
21 sex trafficking, pacs, search engine rigging, crony jobs, biased censoring, campaign funds, stock  
22 market manipulations, ukrainian money laundering, etc.) to delay justice and blockade our, and  
23 your, rights! There can be no question about the fact that Google, Facebook, Netflix, Tesla and the  
24 Silicon Valley Cartel control the Obama and Biden White House. For example: Elon Musk ordered  
25 the politicians who are his bitches to sabotage his competitors. He gave those political insiders:  
26 cash, stock in his cartel, revolving-door jobs, campaign funding, sex workers, off-shore money  
27 laundering, and other quid pro quo. Eric Schmidt, Larry Page, Mark Zuckerberg, and the rest of the  
28 tech mob, all worked together on these crimes.

1        [The hacks and leaks of their documents](#) prove it. Government agency bosses are covering  
2 up these crimes to protect their jobs and their corrupt stock market holdings. Musk and Goldman  
3 Sachs have gotten over FIFTEEN BILLION DOLLARS of free taxpayer cash and monopolized  
4 exclusives to pay for [Musk's drugs, sex parties and mansions](#). This is one of the largest violations  
5 of anti-trust laws in history. The politicians and agencies that are supposed to stop him are getting  
6 money from him. [Musk](#) exists entirely from quid pro quo bribes! Musk's banks, including Deutsche  
7 Bank, have had to pay more than \$100 million to settle charges related to violating anti-bribery laws  
8 and engaging in money laundering. While the Musk-controlled media bloviate on the god-like  
9 image of Musk, he and his buddies are just crooks and mobsters. It is now almost impossible for the  
10 public to reach any media source that is not controlled by the Silicon Valley Cartel via synchronized  
11 talking points. Politicians who say that their only motivation is to "save" the helpless billionaire  
12 Elon Musk and his unicorns: 1.) sabotage any companies who are not making Tesla's, 2.) have sex  
13 with Tesla lobbyists and bankers, 3.) own the stock in Tesla Motors, 4.) are venture capital partners  
14 in Kleiner Perkins (ie: Gore) and Greylock capital insiders, 5.) trade revolving door jobs with the  
15 Elon Musk cartel, 6.) gave [Musk](#) over \$15B of free taxpayer money, 7.) get campaign financing  
16 from [Musk](#), 8.) order government agencies to freeze funding for [Musk](#)'s competitors, 9.) and engage  
17 in a vast number of other corruption and anti-trust crimes.

18  
19 U.S. Senators, Agency Heads and Congress are bribed by Google intermediaries with: Billions of  
20 dollars of Google, Twitter, Facebook, Tesla, Netflix and Sony Pictures stock and stock warrants  
21 which is never reported to the FEC; Billions of dollars of Google, Twitter, Facebook, Tesla, Netflix  
22 and Sony Pictures search engine rigging and shadow-banning which is never reported to the FEC;  
23 Free rent; Male and female prostitutes; Cars; Dinners; Party Financing; Sports Event Tickets;  
24 Political campaign printing and mailing services "Donations"; Secret PAC Financing; Jobs in  
25 Corporations in Silicon Valley For The Family Members of Those Who Take Bribes And Those  
26 Who Take Bribes; "Consulting" contracts from McKinsey as fronted pay-off gigs; Overpriced  
27 "Speaking Engagements" which are really just pay-offs conduited for donors; Private jet rides and  
28 use of Government fuel depots (ie: Google handed out NASA jet fuel to staff); Real Estate; Fake

1 mortgages; The use of Cayman, Boca Des Tores, Swiss and related money-laundering accounts;  
2 The use of HSBC, Wells Fargo, Goldman Sachs and Deutsche Bank money laundering accounts  
3 and covert stock accounts; Free spam and bulk mailing services owned by Silicon Valley  
4 corporations; Use of high tech law firms such as Perkins Coie, Wilson Sonsini, MoFo, Covington &  
5 Burling, etc. to conduit bribes to officials. This will never end unless the public demands laws to  
6 prevent all politicians, and their families, from owning ANY stock market stocks or securities!

7  
8 **MUSK AND TESLA:**  
9

10 The Musk empire has paid more bribes to politicians than almost any other modern entity. That is  
11 why no full investigation of the Musk scams has ever been completed. Google's Eric Schmidt and  
12 Larry Page have a bromance relationship with Musk and use the global resources of Alphabet to  
13 hide any negative news about Musk assets. The 2008 Department of Energy Cleantech Crash proves  
14 that a federal agency was used as just one big slush-fund to pay-off political campaign financiers,  
15 operate insider-trading stocks and sabotage those financiers competitors using taxpayer-financed  
16 resources! We have used private investigator, FBI resources and deep AI research to reveal that all  
17 government staff working on our application were getting quid-pro-quo...they were on the take.  
18 (Can anyone point out to us EVEN ONE person who was in the GOVT/White House loop who was  
19 not working for, invested in, getting a future job from or other wise conflicted?) What do you do  
20 when The U.S. Government convinces you to invest millions of dollars, and your life, into one of  
21 their projects. Then their project turns out to be a scam where they had covertly hard-wired the  
22 upside to a couple of Senator's and their campaign financier friends. The fix was in and the game  
23 was rigged to use a government program as a slush-fund for friends-with-benefits. We, and the  
24 public, got defrauded.

25 Now the damages must be paid for, one way, or another. Every one of the insiders who did  
26 get government funding got it in the exact same size and order as their covert political campaign  
27 funding and stock market bribes to the deciders. Chamath Palihapitiya and other Silicon Valley  
28 insiders have now exposed the fact that Greylock, Kleiner, etc. are just a VC Ponzi Scheme! in this

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1 whole mess. Musk used crooked Senators to get his funds. Those Senators and government agency  
2 bosses were financed by, friends with, sleeping with, dating the staff of, holding stock market assets  
3 in, promised a revolving door job or government service contracts from, partying with, personal  
4 friends with, photographed at private events with, making profits by consulting for, exchanging  
5 emails with, business associates of or directed by; one of those business adversaries, or the Senators  
6 and politicians that those business adversaries pay campaign finances to, or supply political search  
7 engine manipulation services to. Elon Musk is notorious for getting Department of Energy money  
8 by bribing public officials and placing his friends: Steven Chu, Matt Rogers, Steve Westly, Steve  
9 Spinner's 'special friend', etc. on the staff of The U.S. Government and in the White House. We  
10 have FBI-class records, financial tracking, emails, stock market relay records and other forensic  
11 data that proves it. We can swear, warrant, certify and prove these assertions in front of Congress in  
12 a live Congressional hearing or Civil Jury trial, given non-compromised legal backing.  
13 If you think you have bribed the same number of Senators, bought a President and taken over  
14 most of The U.S. Government like Musk did... go for it! In this day and age, with every citizen  
15 able to track every public figure, with FBI-quality databases, on their home computers, it might be  
16 a crash-and-burn but you are welcome to try. [Lithium metals, and other rare earth mining](#)  
17 [materials, are monopolized by Elon Musk and his Silicon Valley Cartel, in rare-earth corrupt](#)  
18 [mining scams. Lithium's widespread use in cars is hindered by a challenging obstacle: upon](#)  
19 [multiple charge-discharge c](#)Musk and Panasonic have known this since 2007 (They are  
20 "dumping" the batteries via Tesla) and have paid U.S. Senators, who own stock in Tesla, to cover  
21 it up.  
22  
23  
24

25 The lithium fires and toxic vapors are a major safety concern because they have killed,  
26 poisoned and injured too many citizens. Musk gets away with his scams because he pays U.S.  
27 Senators bribes with stocks in his corporations and has a thousand crooked Goldman Sachs  
28 investment bankers selling his hair-brained schemes to your parents pension funds. Tesla is known

1 as "the official car of douche-bags". The safety defect cover-ups on the Tesla are extreme. Musk's  
2 narcissistic trophy-wife mom and his extremist father (who got his young sister pregnant) are  
3 thought to be the cause of Musk's racism and sociopath behaviors. He is the #1 crony capitalist  
4 government mooch in America and has received billions of dollars of your tax money to help him  
5 buy his mansions, starlets and sex parties. His cars and rockets blow up, his tunnels are unsafe, his  
6 satellites spy on consumers and his brain chip company tortures small animals. He swiped all of his  
7 technology from someone else and has never come up with his own inventions. Space-X is just a  
8 domestic spying company. Don't buy Musk's bullshit about Space-X doing any good deeds.  
9 Everything Space-X launches is to spy on the poor folks on the ground and monitor their internet.  
10 Also, Musk's Neuralink company tortures small animals to try out Musk's pseudo-science mind-  
11 reading chips.

12  
13 **GOOGLE:**

14  
15 THE INVESTIGATIONS OF THE CORRUPTION AT GOOGLE: Google exists to mass  
16 manipulate populations and run stock market scams for Google's owners. From INSIDE Google,  
17 our team saw Google manipulate the entire internet to hype up Larry Page's "boyfriend": Elon Musk  
18 and Tesla, which Google execs owned a portion of, while sabotaging Tesla's competitors. Google  
19 illicitly and illegally timed these manipulations with stock market pump-and-dump efforts to exploit  
20 insider trading. That is a felony violation of RICO, Antitrust and other laws. Every single thing that  
21 Google does is contrived to harm a competitor, a politician, an employee whistle-blower or some  
22 other business adversary. There are no "bugs", "operator errors", "server anomalies" or other media  
23 "accidents" at Google. Everything Google does is contrived, at a psychological warfare kind of  
24 level, to change a social perception. Google must show its software to FBI, SEC, FTC and our  
25 search engine optimisation experts to prove that they did not engage in these crimes. The fact is: We  
26 can prove they did the crimes and FBI experts can help us prove it! Google is known as the "Nazi's  
27 of the Internet". In a case unfolding in Britain over whether Google wrongly demoted price  
28 comparison rival Foundem from its search results in favour of paid-for adverts, Google must now

1 decide which it values more: the algorithms that rank its search results, or its stance that manually  
2 fiddling with those results to promote its own paid-for products over rivals' sites doesn't break  
3 competition laws. The integrity of Google's ranking processes relies upon all webmasters or website  
4 owners having the same degree of access to information about Google's ranking... This will no  
5 longer be the case if information of this kind is made available to some individuals offering  
6 commercial services to assist companies to improve their Search ranking. Google is a criminal  
7 operation.

8         It's executives have been publicly exposed as participants in horrific sex scandals, money  
9 laundering, political bribery and racism. It is time for the bought and paid shill politicians to stop  
10 protecting them! - Google spies on competitors and steals their technology - Google runs tens of  
11 millions of dollars of defamation attacks against competitors - Google hides all media and news  
12 coverage for competitors of Larry Page's boyfriend: Elon Musk - Google lies to the public about  
13 what they really do with the public's data - Google promotes illegal immigration in order to get  
14 cheap labor and control votes - Google runs VC funding back-lists against start-ups that are  
15 competitive - Google bribes thousands of politicians - Google is a criminal RICO-violating  
16 monopoly - Google rigs the stock market with Flash-boy, Pump/Dump and Microblast SEC  
17 violating computer tricks - Google pays bribes to politicians in Google and YouTube stock - Google  
18 manipulates who gets to see what web-sites, globally, for competitor black-lists - Google has a "no  
19 poaching" Silicon Valley jobs blacklist - Google bosses sexually abuse women and young boys -  
20 Google bosses run sex trafficking operations in the Epstein and NXVIUM cults - Google bosses  
21 control the NVCA financing cartel over start-ups - Google has placed the majority of the corporate  
22 staff in at least one White House - Google controls national elections for anti-competitive purposes -  
23 The company "Polyhop", in the HOUSE OF CARDS tv show, does all the crimes that Google  
24 actually does in reality - Google's law firms, like Wilson Sonsini, are corrupt conduits for payola  
25 and political conduit-relays - Google bribes some politicians with revolving door jobs - Google is  
26 primarily responsible for destroying the Bay Area Housing opportunities.

27         Google runs DDoS attacks on competitors by massively crawling their sites - Google boss  
28 Andy Rubin runs a sex slave farm according to his own family - Google boss Eric Schmidt was a



1 philandering sex-penthouse owner according to vast news articles - Google executives hire so many  
2 hookers that one of them, Mr. Hayes, was killed by his hooker - Google executives sexually abuse  
3 so many women that the women staff of Google walked out one day - In the 2009 White House,  
4 you could not swing a cat without hitting a Google insider - Google has paid covert bribes, PAC  
5 funds, real estate and search rigging payola to every CA Senator - Google has paid bribes, through  
6 its lobby fronts, to halt FBI, SEC, FEC and FTC investigations of Google crimes - Google was  
7 funded by the CIA, via In-Q-Tel, a so called "501 c3 charity" which was caught with tons of  
8 cocaine - Google gets millions of dollars of taxpayer cash for spying on Americans inside the USA -  
9 Google's map service was a spy system paid for by taxpayers money that Google now profits off of  
10 - Nancy Pelosi and Dianne Feinstein have promised to "protect" Google because their families  
11 profit off Google stocks.

12 Payment receipts prove that Google and Gawker/Gizmodo exchanged cash and staff for  
13 Character Assassination attacks - Google VC's and bosses have spent \$30M+ rigging the U.S.  
14 Patent Office to protect Google and harm Google competitors - Google bribed it's lawyer into  
15 position as head of the U.S. Patent office in order to have her protect Google - To rig insider stock  
16 trades, Google hides negative Tesla stories and pumps positive Tesla stories on "push days" -  
17 Google and Elon Musk Co-own, co-invest and co-market stocks covertly while running anti-trust  
18 schemes - Google rarely likes, or hires, black employees per federal and news media investigations  
19 - Google hired most of the Washington, DC K Street lobby firms and told them to "do what ever  
20 they could" - The film: "Miss Sloane" depicts only 2% of the illicit lobbying tactics Google  
21 employs daily - Demands for an FTC and FBI raid of Google, for criminal activity, securities law  
22 and election felonies have been filed - Google's David Drummond had his Woodside, CA Quail  
23 Road house bugged revealing sex and financial misdeeds.

24 Google, and it's Cartel (Alphabet, Youtube, and hundreds of other shell-company facades)  
25 are a criminal organization engaged in felony-class crimes. Google's bosses bribe politicians,  
26 regulators and law enforcement officials to hold off prosecution. At Google: Kent Walker, Andy  
27 Rubin, Larry Page, Eric Schmidt, Sergy Brin, Jared Cohen, Yasmin Green, David Drummond and  
28 Ian Fette are so enmeshed in sex scandals, election manipulation, and White House bribes that it is

1 hard to comprehend how they can get any legitimate work done. Google executives came from most  
2 of the fraternity houses involved in the college rape scandals. Google sells covert character  
3 assassination services to politicians and fellow oligarchs. Youtube/Google/Alphabet/Deep State are  
4 all the same entity. They conspire to hide news about their corruption and they control most of the  
5 internet.

6  
7 **THE TECH CARTEL:**  
8

9 The Silicon Valley tech Cartel (AKA: "Paypal Mafia", "Deep State") is evil because these racist,  
10 ageist, sex-trafficking, money-laundering, elitist, politician bribing, tax evaders: steal any  
11 technology they desire; They manufactured the CLEANTECH CRASH as shown in the 60  
12 MINUTES episode of the same name; they run a prostitution ring and sexually extort young women  
13 and interns in Silicon Valley; they are 'rape culture' take-what-they-want misogynists, ageists and  
14 racists as their history of abuses has proven; their Palo Alto Cartel operates AngelGate-type  
15 collusion and stock market insider trading schemes that harm independent business and the public;  
16 their Cartel ran the "no poaching" CEO ring which was class-action sued by DOJ and tech workers;  
17 90% of their divorce court files reveal horrific abuses and sex trafficking; They have an army of  
18 lobbyists that pay cash, stock market and revolving door bribes to U.S. Senators; They can even  
19 evade FBI & SEC investigations; They hire women to act as 'trophy wives' and 'beards'; they have  
20 lobbyists rig the U.S. Patent Office in order to block inventor patent rights because they are using  
21 stolen technologies; they have been caught on video and recordings beating, kicking and harming  
22 women hundreds of times; They have bought up all of the Tier-One tech law firms and order them  
23 to black-list, and never help, those who seek equal tech rights; they collude to abuse your privacy  
24 and make databases on the public for political control; they have to cheat to compete because they  
25 are only good with spread sheets instead of innovation; They run black-lists, character assassination  
26 attacks, collusion and other anti-trust violating acts in violation of RICO laws.

27 Silicon Valley has become the largest assemblage of douche-bags and yuppie frat boy  
28 criminals in human history. Theranos is not the exception, it is the standard. Tesla, Google,

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1 Theranos, Wework, Facebook are lies backed by famous political insiders to protect their insider  
2 trading and covered-up by fake news operators. They are also fronts to fund political campaigns via  
3 the ill-gotten profits from their endeavors. When the bad guys, and their lap-dog politicians, attack  
4 you because your products are better than theirs they are proving that they are frat boy scumbags,  
5 from Stanford and Yale, that operate in a little pack, like dogs! Their Sandhill Road operation  
6 should be raided by the FBI! The best thing that could come from the COVID pandemic is that they  
7 all are forced into bankruptcy! When your Senator holds stock market shares in companies that exist  
8 to profit on the backs of consumers, via corruption, then it is impossible for that Senator to ever do  
9 anything but be corrupt! We have reported this in writing to winklerm@sec.gov,  
10 sanfrancisco@sec.gov and 30+ other federal officers but have yet to see our whistle-blower  
11 rewards...or any action! Do you wonder how big politician insider stock trading is? Take a look at  
12 how many TRILLIONS of dollars pass through the stock markets annually and then look at the  
13 reported, AND UNREPORTED, securities holdings of famous U.S. Senators and government  
14 agency staff. That is what Seth Rich and the people in the "In Memory Of" section, below, were  
15 disclosing.

16       These are massive crimes! The perpetrators operate a massive and abusive national sex cult.  
17 The perverts in the SandHill Road Venture Capital offices, located between Highway 280 down to  
18 to Santa Cruz Avenue on Sand Hill Road in Menlo Park, California, are the main perpetrators of  
19 this global cartel. Their executives at Google, Facebook, Netflix, Linkedin, Twitter, and their  
20 related holdings, comprise the rest. The Harvey Weinstein and Ed Buck sex scandals are well  
21 known. These men's sex cult actions have been widely covered in the news individually in the Joe  
22 Lonsdale rape case, The Kleiner Perkins Ellen Pao sex abuse lawsuit, The Eric Schmidt sex  
23 penthouse stories, The Jeffrey Epstein case, The Google Forrest Hayes hooker murder case, The  
24 Andy Rubin sex slave case, The Sergy Brin 3-way sex romp scandal, The British Hydrant  
25 investigation, The Elon Musk Steve Jurvetson billionaire sex parties scandals, The NXIVM sexual  
26 slave cases, The Michael Goguen anal sex slave trial, The Tom Perkins Hooker Parties and  
27 thousands of other cases and federal divorce court filings. This group of people have proven  
28 themselves, over and over, to be sociopath control freaks not fit for participation in public

1 commerce, public policy or media control. The Four Seasons Hotel and Rosewood Hotels in Silicon  
2 Valley are estimated to engage in over \$30,000.00 of high-end escort sex trafficking per day, a  
3 portion of it managed by Eastern Bloc Mafia operators. The Elon Musk sex perversions are the tip  
4 of the iceberg.

5 At least 10 Ukrainian escorts fly in and out of SFO and SJO airports every week for these  
6 Cartel members. Google boss David Drummond engaged in horrible philandering sexual violations  
7 of his wife yet Google covers up every story about it on the web. Google's Eric Schmidt is under  
8 massive investigation. You hear about the female victims of this sex cult but you rarely hear about  
9 the young male victims. One of their vast numbers of prostitutes is quoted as saying that the girls  
10 and boys are paid "not just for sex but for the oligarch's endless need to feel that they can control  
11 anyone for any reason...". Multiple attorney general's controlled by their cartel, ie: Eric  
12 Schneiderman and Eliot Spitzer, are involved this these sex rings. These are the main influencers of  
13 a national political party and they are all involved in horrific sex perversions and abuses! All Silicon  
14 Valley tech cartel media companies work together to censor all news and information in order to  
15 hide coverage of their dirty deeds and to only put politicians in office that will give the Cartel  
16 political payola, kick-backs and insider stock pumps.

17 The Smedley Butler "Business Plot" from the past is not unlike the coup that Google and  
18 clan tried. See details in Emily Chang's book: BROTOPIA; Roan Farrow's book: CATCH & KILL;  
19 Edward Snowden's Book: PERMANENT RECORD; Peter Schwetzer's book: THROW THEM  
20 ALL OUT; Dave Eggers book: THE CIRCLE; Franklin Foer's book: WORLD WITHOUT MIND;  
21 Corey Pein's book: JOURNEY INTO THE SAVAGE HEART OF SILICON VALLEY; Dan Lyon's  
22 book: DISRUPTED; Antonio Martinez book: CHAOS MONKEYS. The Angelgate, Epstein, No-  
23 Poaching DOJ Class Action, and hundreds of other cases, prove that they meet, conspire, collude  
24 and blacklist in felony violation of anti-trust and RICO Racketeering laws. - 90% of these guys  
25 came from 100% of the fraternity houses involved in the recent college rape cases.

26  
27  
28 **THE HIRED CHARACTER ASSASSINS AND KILLING THE WHISTLE-BLOWERS**

1  
2 POLITICAL KILL ORDERS AND STATE-SPONSORED CHARACTER ASSASSINATIONS -  
3 How A Modern Character Assassination and Political "Kill Order" Is Executed By the Silicon  
4 Valley Oligarchs and their total control of propaganda media. Patrick George At Jalopnik attacks  
5 outsiders under contract with Elon Musk and the DNC. Silicon Valley campaign finance oligarchs  
6 hire him to run hatchet jobs on innocent outsiders and then Gawker-Gizmodo-Jalopnik uses their  
7 financial partnership with the DNC's Google to push the character assassination articles to the top of  
8 Google web products and searches. Patrick George, Adrian Covert, John Hermann and Nick Cook  
9 are the sexually degenerate cabin boys that report to boy-loving sleaze-tabloid oligarch Nick  
10 Denton. They created the Fake News crisis in the media by flooding the internet with defamation  
11 posts and reprisal hatchet job articles designed to damage political enemies of the Socialists. They  
12 coordinate a large number of the character assassination efforts at Gawker, Gizmodo, Jalopnik,  
13 CNN, New York Times and other propaganda outlets. These Millennial boys are "Media Rapists"  
14 and should be treated as abusers. - How and why did a Donald Trump stripper-date named "Stormy"  
15 or an Elon Musk sex party or a Kavanaugh drinking incident or the Moonves and Weinstein  
16 indiscretions suddenly hit the news at about the same time in news history? - In addition to actual  
17 murder, Politicians and Silicon Valley Oligarchs hire operatives to end people's lives in other  
18 creative ways. - It is all part of the modern trend in vendetta, revenge and political payback when a  
19 Senator or a tech oligarch issues a "kill order" on an opponent.

20 The client does not like to get their hands dirty so the actual social hit job is performed by  
21 companies such as: IN-Q-Tel - (DNC); Gawker Media - (DNC); Jalopnik - (DNC); Gizmodo Media  
22 - (DNC); K2 Intelligence - (DNC); WikiStrat - (DNC); Podesta Group - (DNC); Fusion GPS -  
23 (DNC/GOP); Google - (DNC); YouTube - (DNC); Alphabet - (DNC); Facebook - (DNC); Twitter -  
24 (DNC); Think Progress - (DNC); Media Matters - (DNC); Black Cube - (DNC); Mossad - (DNC);  
25 Correct The Record - (DNC); Sand Line - (DNC/GOP); Blackwater - (DNC/GOP); Undercover  
26 Global Ltd (DNC/GOP) Stratfor - (DNC/GOP); ShareBlue - (DNC); Wikileaks (DNC/GOP);  
27 Cambridge Analytica - (DNC/GOP); Sid Blumenthal- (DNC); David Brock - (DNC); PR Firm  
28 Sunshine Sachs (DNC); Covington and Burling - (DNC), Buzzfeed - (DNC) Perkins Coie - (DNC);

1 Wilson Sonsini - (DNC) and hundreds of others...These are the people and companies that except  
2 cash, revolving door jobs, political appointments, insider trading stock in Silicon Valley tech  
3 companies, prostitutes and real estate in exchange for destroying the lives of others. - These  
4 attackers deserve to be punished for the rest of their lives for taking away the lives of others in  
5 exchange for cash. Any company who is corrupt enough to hire any of these assassins should be  
6 forced out of business. These attack services are responsible for 90% of the "Fake News" problem  
7 in the world because they are the authors of most fake news. Congress must act to make these kinds  
8 of companies illegal! - These digital assassination services offer hit-jobs, character assassinations  
9 and economic reprisal programs to famous billionaires and corrupt politicians who are seeking  
10 revenge, retribution and vendetta executions. - In the case of reporters getting targeted for attacks,  
11 President Donald Trump has been accused by the liberal corporate media of whipping up a hateful  
12 frenzy against the press. But while CNN's Jim Acosta grandstands against Trump, real journalists  
13 are still reeling from the draconian extrajudicial measures that Barack Obama and his administration  
14 used to target them for exposing truth. - This secretive targeting occurred while Obama  
15 speechwriter and hate-filled ANTIFA supporter Ben Rhodes was running "Operation Echo  
16 Chamber," which reportedly continues, in which he fed information to willing corporate media  
17 scribes. "They literally know nothing," Rhodes said of the twentysomething journalists he easily  
18 manipulated. - The Freedom of the Press Foundation's Trevor Timm published documents showing  
19 how former attorney general Eric Holder changed the rules to more effectively intimidate and  
20 surveil members of the press. - Timm writes: "Today, we are revealing—for the first time—the  
21 Justice Department's rules for targeting journalists with secret FISA court orders. The documents  
22 were obtained as part of a Freedom of Information Act lawsuit brought by Freedom of the Press  
23 Foundation and Knight First Amendment Institute at Columbia University."

24 Obama is also clearly linked to the plot to obtain fraudulent FISA warrants on President  
25 Trump's team, as evidenced by Peter Strzok and Lisa Page's texts confirming that Obama was  
26 overseeing their fly-by-night operation. - Larry Schweikart reported for Big League Politics: For  
27 months pundits and researchers have been pondering the mystery of the FISA approval that led to  
28 the illegal and historically titanic scandals to ever hit The U.S. Government . Some have argued that

1 Assistant Attorney General Rod Rosenstein knew the FISA was bogus when he extended it. Others  
2 have wondered if Special Counsel Robert Mueller knew about the fraudulent basis of the FISA  
3 when he used it, in part, to indict Michael Flynn. Other still, that Mueller was fooled by the FBI.  
4 This is what President Trump calls “SPYGATE”. - It may well be that the surveillance that was  
5 conducted began with UK intelligence services and then was fed back to the White House of Barack  
6 Obama. Here’s the kicker: President Barack Obama did not need a FISA warrant to authorize  
7 spying/electronic surveillance on Trump because Obama all along had legal authorization to by-  
8 pass the normal court vetting process. According to 50 U.S. Code 1802, the “Electronic  
9 Surveillance Authorization” () “Foreign intelligence in relation to a US person (Trump or his  
10 associates) is information that’s necessary for the US to protect against attack, hostile acts,  
11 sabotage, . . . as well as other clandestine activities by a foreign power . . . OR . . . information  
12 relevant to national defense/security of the US, or the conduct of foreign affairs of the U.S.” Such  
13 an authorization by Obama required certification by Attorney General Loretta Lynch that must be  
14 logged with the FISC court. (“The [AG]+ shall immediately transmit under seal to the court [FISC]  
15 a copy of his certification.”) - In short, the DOJ has this. If we are correct, a copy of that  
16 certification is currently under seal at least with the DOJ and the FISC. - This is what they are  
17 hiding. - However, the Act requires the AG to keep the Select Committee on Intelligence and the  
18 Senate Committee on Intelligence informed of these authorizations and unmaskings therein. See  
19 1803 (a) (1) (C) If indeed this is what happened, did Lynch report—or only selectively report—to  
20 the committees in a way that excluded non-friendlies? Can you see why Adam Schiff, Mark  
21 Warner, and their ilk are terrified? - These are the playbook tactics that Senators and tech oligarchs  
22 most often use to destroy the lives of their political and business enemies: - Government agency  
23 bosses sometimes solicit the target victims with false promises of future loans, contracts or grants  
24 from their agency and cause the target victims to expend millions of dollars and years of their time  
25 for projects which those government bosses had covertly promised to their friends. They use the  
26 target victims as a “smokescreen” to cover their illegal government slush-funds for the victims  
27 competitors and personal enemies. By using this tactic, the attackers can drain the target victims  
28 funds and force them into an economic disaster in plain view of everyone without the government



1 bosses fearing any reprisal for their scam.-

2 Every match.com, okcupid.com, Plenty Of Fish, Seeking Arrangements and all other IAC-  
3 owned, or similar, dating sites (IAC is managed by Hillary Clinton's daughter) have had their  
4 profiles, texts, and inter-member communications, since those companies were started, hacked or  
5 purchased. The attack service providers use Palantir and In-Q-Tel financed data analysis software to  
6 analyze every activity in those dating services in order to find honey-trap, blackmail, sextortion and  
7 social conflict exploitation opportunities. If you had a bad date with someone, that someone will be  
8 hunted down and convinced to help harm, #metoo or "rape charge" the intended target. All dates  
9 involve a search for sex, so the likelihood that a sexual disappointment experience will exist in each  
10 persons dating history is high. Searching every past dating email and text of a subject is quite easy  
11 with modern software and hacking techniques. A synthetically amplified, PR-agency optimized sex  
12 scandal can destroy any target. Your dating experiences from the 70's or 80's will come back to  
13 haunt you decades later. Most dates involve drinking alcohol and taking drugs. If you were  
14 unattractive or had bad sexual skills your bad date will be called "date rape", "drugging your date  
15 for sex" and related twisted narratives that are designed to shame you, the target. If you try to get a  
16 date in the future, your potential date will be contacted by a third party who will slander and libel  
17 you to make sure your potential first date gets cancelled. Your social life will, essentially, end.  
18 Every photo on every dating site is cross checked with every other photo on the internet in order to  
19 cull your Facebook, Linkedin, Snapchat and other social media together to create a total  
20 psychological manipulation profile data file on you. A single photo on a dating site can be cross  
21 searched on every mugshot archive, photo album and corporate database in the worth within  
22 minutes using modern super-computers. Your sex life will be on public record in a flash.- Social  
23 Security, SSI, SDI, Disability and other earned benefits are stone-walled. Applications of targets are  
24 "lost". Files in the application process "disappeared". Lois Lerner hard drive "incidents" are  
25 operated in order to seek to hide information and run cover-ups. - Government officials and tech  
26 oligarchs contact members of the National Venture Capital association (NVCA) and created  
27 national "black-lists" to blockade target victims from ever receiving investor funding. This was also  
28 confirmed in a widely published disclosure by Tesla Motors Daryl Siry and in published testimony.



1 If Silicon Valley political campaign finance oligarchs black-list you (see the "AngelGate" Scandal  
2 and the "High Tech No Poaching Class Action Lawsuit" cases) you will never get investor funding  
3 again. - FOIA requests are hidden, frozen, stone-walled, delayed, lied about and only partially  
4 responded to in order to seek to hide information and run cover-ups.- State and federal employees  
5 will play an endless game of Catch-22 by arbitrarily determining that deadlines had passed that  
6 they, the government officials, had stonewalled and obfuscated applications for, in order to force  
7 these deadlines that they set, to appear to be missed. This can bankrupt a target victim.- Some  
8 Victims found themselves strangely poisoned, not unlike the Alexander Litvenko case. Heavy  
9 metals and toxic materials were found right after their work with The U.S. Government weapons  
10 and energy facilities. Many wonder if these "targets" were intentionally exposed to toxins in  
11 retribution for their testimony.

12       The federal MSDS documents clearly show that a number of these people were exposed to  
13 deadly compounds and radiations, via GOVT, without being provided with proper HazMat suits  
14 which GOVT officials knew were required. - Victims employers are called, and faxed, and ordered  
15 to fire target victims from their places of employment, in the middle of the day, with no notice, as a  
16 retribution tactic. - On orders from Obama White House officials, DNC-financed Google, YouTube,  
17 Gawker Media and Gizmodo Media produce attack articles and defamation videos. Google locks  
18 this attack media on the internet on the top line, of the front page of all Google searches for a  
19 decade in front of 7.5 billion people, around the world. This attack-type uses over \$40 million  
20 dollars in server farms, production costs and internet rigging. The forensic data acquired from  
21 tracking some of these attacks proves that Google rigs attacks against individuals on the internet and  
22 that all of Google's "impressions" are manually controlled by Google's executives who are also the  
23 main financiers and policy directors of the Obama Administration. This data was provided to the  
24 European Union for it's ongoing prosecution of Google's political manipulation of public  
25 perceptions. - Victims HR and employment records, on recruiting and hiring databases, are  
26 embedded with negative keywords in order to prevent the victim targets from ever gaining future  
27 employment. - Gary D. Conley, Seth Rich, Rajeev Motwani and many other whistle-blowers in  
28 these matters, turned up dead under strange circumstances. It is very possible that some of these

1 attack services, operated by former CIA operatives, even offer discrete murder-for-sale services  
2 using high-tech assassination tools that make murders look like heart attacks and brain failures. -  
3 Disability and VA complaint hearings and benefits are frozen, delayed, denied or subjected to lost  
4 records and "missing hard drives" as in the Lois Lerner case.- Paypal (A DNC-biased operation) and  
5 other on-line payments for on-line sales are de-platformed, delayed, hidden, or re-directed in order  
6 to terminate income potential for target victims who competed with the attackers interests and  
7 holdings.- DNS redirection, "website spoofing" sends target victims websites to dead ends where no  
8 sales orders or customer inquiries actually get back to the target.

9       These internet revenue activity manipulations are conducted using Google and Amazon  
10 servers. All commercial storefronts and on-line sales attempts by target victims, will have had their  
11 sites hidden, or search engine de-linked by a massively resourced facility located in Virginia, Texas  
12 or Palo Alto, California in order to terminate revenue potentials for the target victims.- Over 50,000  
13 trolls, shills, botnets and synth-blog deployments are deployed to place defamatory statements and  
14 disinformation about victims in front of 7.5 billion people around the world on the internet in order  
15 to seek to damage their federal testimony credibility by a massively resourced facility. - Campaign  
16 finance dirty tricks contractors are hired by campaign financiers to attack the friends and family  
17 members of the target victim in order to create low morale for the target victims psyche and  
18 motivation.- Are you getting weird headaches and hearing a "buzzing sound" in your head? The  
19 U.S. Government has now acknowledged that the Cuban, Chinese and other embassy "sonic  
20 attacks" are from a known microwave beam weapon. Any one of the technical departments of the  
21 attack services listed at the top of this article can build such a biological harassment weapon. It can  
22 be aimed at the target victims office, bedroom or vehicle and, within a week, have caused biological  
23 and emotional damage using a weapon that has no visible track of trajectory. It is designed to make  
24 the target victim think they are "going crazy" or "hearing sounds in their head".- In one case covert  
25 political partner: Google, transferred large sums of cash to dirty tricks contractors and then  
26 manually locked the media portion of the attacks into the top lines of the top pages of all Google  
27 searches globally, for years, with hidden embedded codes in the links and web-pages which  
28 multiplied the attacks on Victims by many magnitudes.- Covert Cartel financier: Google, placed

1 Google's lawyer: Michelle Lee, in charge of the U.S. Patent Office and she, in turn, stacked all of  
2 the U.S. Patent Office IPR and ALICE review boards and offices with Google-supporting  
3 employees in order to rig the U.S. Patent Office to protect Google from being prosecuted for the  
4 vast patent thefts that Google engages in. Google has hundreds of patent lawsuits for technology  
5 theft and a number of those lawsuits refer to Google's operations as "Racketeering", "Monopolistic  
6 Cartel" and "Government Coup-like" behaviors. Thousands of articles and investigations detail the  
7 fact that Google, "essentially" ran the Obama White House and provided over 80% of the key  
8 White House staff. A conflict-of-interest unlike any in American history. Google's investors  
9 personally told Victim/Witnesses they would "kill him".

10 Google and the Obama Administration were "the same entity". Victim/Witnesses testified in  
11 the review that got Michelle Lee terminated and uncovered a tactical political and social warfare  
12 group inside Google who were financed by Federal and State funds. - Honeytraps and moles were  
13 employed by the attackers. In this tactic, people who covertly worked for the attackers were  
14 employed to approach the "target" in order to spy on and misdirect the subject. - Gawker Media,  
15 Gizmodo Media, Snopes, SPLC and other hired media assassins will be retained to produce "hatchet  
16 job" character assassination articles about you. Then those articles will be faxed, mailed and  
17 emailed to your employer and investors with a note saying: "You don't want to have anything to do  
18 with this person, do you..?" in order to get you fired from your job and get your loans or financing  
19 pulled. The attackers will use their round one attack media, that they authored, to create a round two  
20 second wave attack designed to end your life via economic warfare.- Mortgage and rental  
21 applications will have had red flags added to them in databases to prevent the targets from getting  
22 homes or apartments.- Krebs On Security, Wired, Ars Technica, The Wall Street Journal and most  
23 major IT publications have reported that hundreds of spy "back-doors" have been found on every  
24 Intel, AMD, Apple, Xfinity, Cisco, Microsoft, Juniper Networks motherboard, chip-set and  
25 hardware component set. This means that any kid with the "key" code can open any computer,  
26 server, router, cloud-network or other network connected device and read every file, photo, video,  
27 your calendar and email on your devices at any time from any location on Earth.

28 The key codes have been released to every hacker community in the world for over ten

1 years. There is now no government, corporate or personal data that can't be hacked, even data from  
2 decades ago. Every single one of your darkest secrets can be in the hands of your enemy within 60  
3 minutes, or less. Important meetings you had planned with potential investors, employers, clients,  
4 dates, suppliers and others will suddenly get cancelled at the last minute. They will get cancelled  
5 because your enemies are reading your calendar remotely and covertly sending slander information  
6 to those you had hoped to engage with in order to sabotage your life. Nothing you have ever typed  
7 on a computer or Smartphone is safe. it WILL be acquired and it WILL be used against you. -  
8 McCarthy-Era "Black-lists" are created and employed against target victims who competed with  
9 Obama Administration executives and their campaign financiers to prevent them from getting  
10 funding and future employment. - [Obama Administration](#) targets were very carefully placed in a  
11 position of not being able to get jobs, unemployment benefits, disability benefits or acquire any  
12 possible sources of income. The retribution tactics were audacious, overt..and quite illegal. - There  
13 are thousands of additional Dirty Tricks tactics being used by these Attack Services yet Congress  
14 refuses to pass laws out-lawing such attack services. The cost of an attack on a person ranges from  
15 \$150,000.00 to over \$50,000,000.00. While a Silicon Valley billionaire can afford to launch  
16 counter-measures to these attacks, any regular taxpayer will be utterly destroyed, and incapable of  
17 fighting back, against even the smallest version of one of these "kill orders".

18 A number of modern office shootings are the results of these attacks against an individual  
19 who has lost everything because of the attack and has no options left. - Federal law enforcement, the  
20 United States Congress and the highest level investigators in the U.S., and abroad, have documented  
21 (per the "FISA Memo", Congressional Reports and federal employee testimony) and proven the fact  
22 that the Obama Administration regularly engaged in the operation of retribution, vendetta and  
23 reprisal campaigns known as "hit-jobs" against domestic natural born U.S. citizen domestic  
24 taxpayers. The Federal Court, in at least one previous court case, has ruled that Victim/Witnesses,  
25 in this particular matter, were the victims and target of a number of these attacks designed to inflict  
26 permanent medical, emotional, character assassination, brand negation, economic and career  
27 damage. The FBI has been asked to interview John Cook, Nicholas Guido Denton, Adrian Covert,  
28 Patrick George, Ian Fette and John Hermann of Gawker/Gizmodo re: their financing, payola and

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hit-job attacks on third parties.

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Adrian Covert (9)

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# ADRIAN COVERT SELLS HIS SERVICES AS A HIRED MEDIA CHARACTER ASSASSIN

Search

Home Profile Find Friends Account

**Adrian Covert** Add as Friend

"Hired Character-Assassin" at The Internet Lives in San Francisco, California Studied Literary Journalism at University of California, Irvine From Santa Rosa, California

**Education and Work**

**Employers**

**The Internet**  
"Hired Character-Assassin"  
I get paid to say/write irresponsible things. It's the best alternative to an inconsequential life of leisure.

**MOG with Daniel Lannon**  
Associate Music Editor · Berkeley, California  
Still considered employable. Definitely a miracle. (CORRECTION: Was considered employable. Still a miracle, however.)

**gizmodo**  
Reporter  
It involves gadgets...I think.

**Stash Your Trash Industries**  
Space Assassin  
Fail.

**College**

**University of California, Irvine**  
Class of 2007 · Literary Journalism · English

**Friends (255)**

**Jake Ravani**  
UCSC

**Michael Herford**  
Santa Clara

**Samuel Kenswil**  
CA College of the

**Sponsored** Create an Ad

**One bee. One whiskey.**

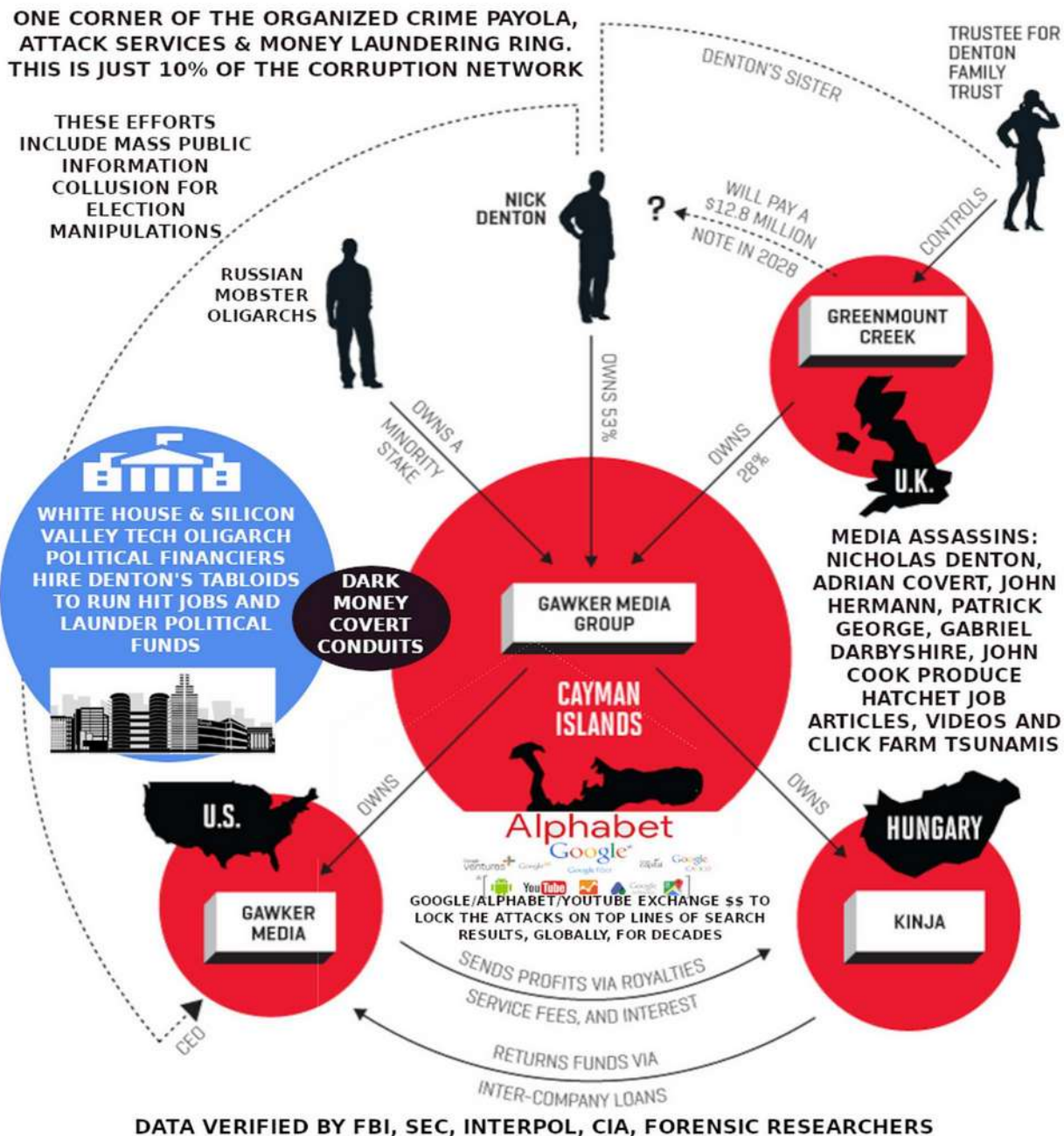
See what happens as the Jack Daniel's Tennessee Honey bee completes its mission. Drink Responsibly. 3D Distillery, Whiskey Specialty.

Where was the Tennessee Honey Bee born?

- A bar
- A black beehive
- A bottle of Jack Daniel's

29,533 people like Jack Daniel's Tennessee Honey.








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## Invoice

Google Inc.  
1600 Amphitheatre Parkway  
Mountain View, CA 94043  
USA  
Federal Tax ID: 77-0402581

**Bill to**  
John Price  
Gawker Media LLC  
210 Elizabeth Street  
4th Floor  
New York, NY 10012  
United States

**Details**  
Invoice number: 3360441914  
Due date: Jun 30, 2016  
Issue date: May 31, 2016  
Payment terms: Net 30  
Billing ID: 2015-2441-6653  
Billing Account Number: 1014-4696-2407-2922

**DFP**  
Account: XFP  
Order name: 4246

**May 1, 2016 - May 31, 2016**  
Account ID: 4246

Description	Rate	Billable Units	Amount (\$)
Advertising Standard	0.0080 CPM	1,542,137,730 Impressions	62,325.23
Advertising Vast Video 3rd Party Hosted	0.1500 CPM	386,662 Impressions	57.99
Advertising Vast Redirect with Linear	0.1500 CPM	13,176,225 Impressions	1,976.43
Advertising DFP Audience First Party Segments	0.1000 CPM	18,830,586 Impressions	1,883.06
Advertising DFP Audience Third Party Segments	-	-	1,393.55
Subtotal in USD:			67,603.25
Tax (0%):			0.00
Amount due in USD:			67,603.25

**Bill to:** Gawker Media LLC  
**Billing ID:** 2015-2441-6653  
**Invoice number:** 3360441914  
Invoice number must be provided together with payment.  
If you are paying for multiple invoices, please provide all invoice numbers in full and separated by " / " with a space before and after.

**Amount due in USD:** \$67,603.25  
**Due date:** Jun 30, 2016

**To pay by wire transfer, send to:**  
Account holder name:  
Bank: Wells Fargo Bank, Palo Alto, CA  
94321-0150  
ABA #: 121000248  
Account #: 4121100648

**To pay by check, mail to:**  
Google Inc.  
Dept. 33654  
P.O. Box 39000  
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U.S. House of Representatives  
**Committee on Oversight and Government Reform**

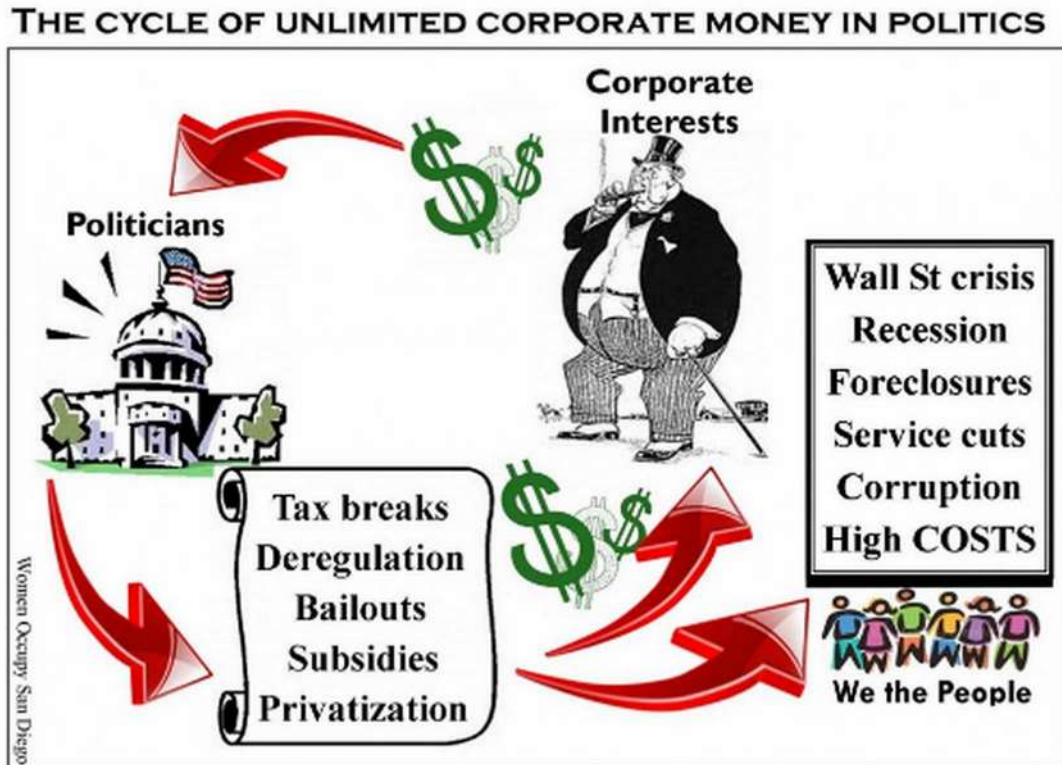


The Department of Energy's Disastrous Management of Loan Guarantee Programs

STAFF REPORT  
U.S. HOUSE OF REPRESENTATIVES  
112<sup>TH</sup> CONGRESS  
March 20, 2012

**THE U.S. CONGRESS REPORTED:**

"After conducting a substantial review of the Department of Energy's (DOE) loan guarantee program, it is clear that the significant losses absorbed by taxpayers as a result of Solyndra's collapse is just the beginning. The investigation conducted by the House Committee on Oversight and Government Reform has uncovered numerous examples of dysfunction, negligence and mismanagement by DOE officials, raising troubling questions about the leadership at DOE and how it has administered its loan guarantee programs. ... DOE has overseen a process wrought with misdirection, changing and expanding requirements, unexplained delays, gross mischaracterizations, and a never-ending cycle of excuses. Not only does it appear that DOE purposely directed taxpayer funds at a failing enterprise, DOE's action robbed taxpayers of genuine investment toward renewable energy."



# HOW THE FEDS THINK THE SCHEME WORKED

This set of extraordinary profit "coincidences" applies to no other set of entities on Earth. It had to be an organized crime set-up rigged as a massive kickback program.

**AFGHANISTAN MINING SCHEMES**

**AFGHAN MINERALS**

**GOLDMAN SACHS &  
SILICON VALLEY BILLIONAIRE  
CONTROLLED MONOPOLY**

**STEVEN CHU & DOE**

**FISKER  
SOLYNDRA  
TESLA  
ABOUND  
ENER1  
SEVERSTAL  
A123  
Etc...**

**MINING CONTRACTS  
TO RUSSIAN OLIGARCHS**



**POWER  
& EGO**

**Owned & Controlled By:**

**GOLDMAN SACHS &  
SILICON VALLEY BILLIONAIRE  
CONTROLLED MONOPOLY**

**STOCK BUMPS  
STOCK SKIMS  
GRANT SKIMS  
TAX WAIVERS  
CLEANTECH GRANTS  
NASA CONTRACTS  
SPY CONTRACTS  
TAX CREDITS  
GREEN WAIVERS  
REGULATION WAIVERS**

**WHITE HOUSE & SENATOR  
CAMPAIGN CASH**

**GOOGLE RESULTS RIGGING**

**GOOGLE VOTER MOOD  
MANIPULATION**

**OBAMA, REID, FEINSTEIN & OTHER CAMPAIGNS**





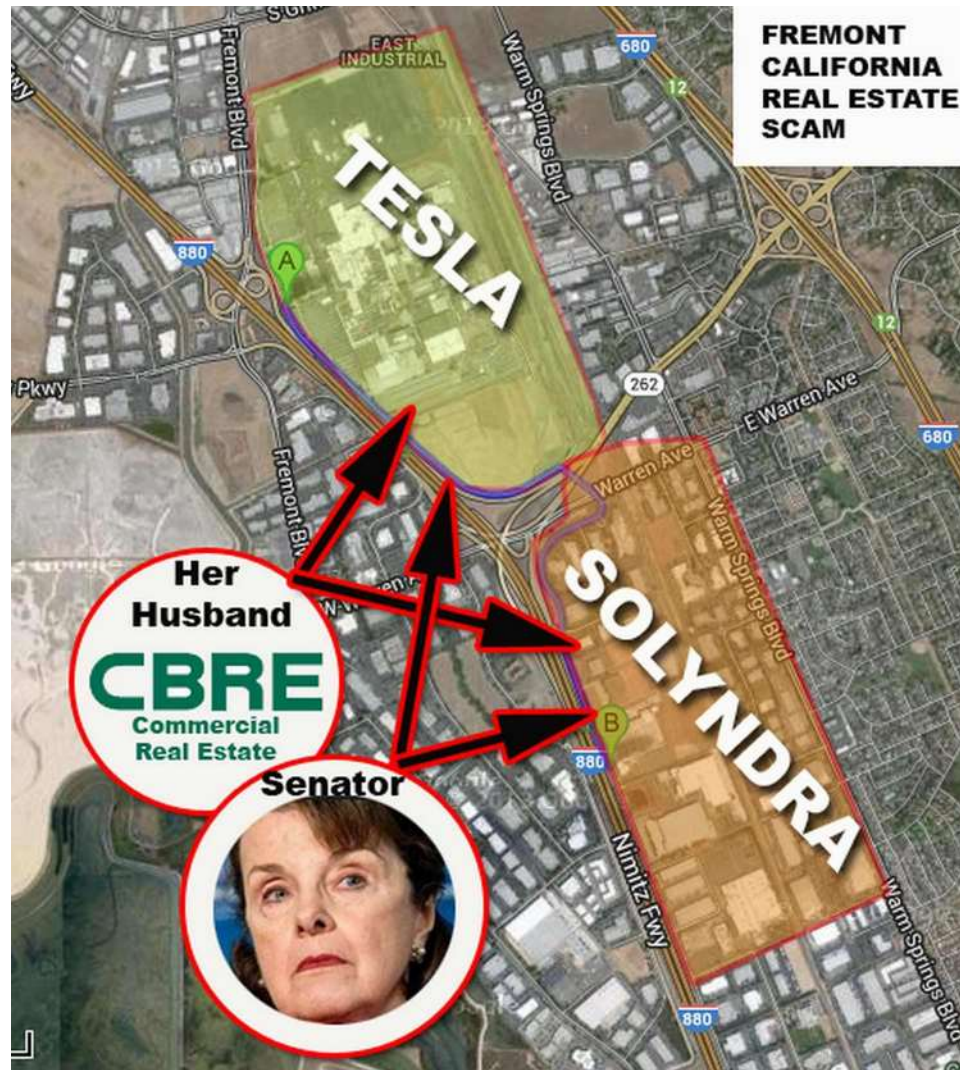
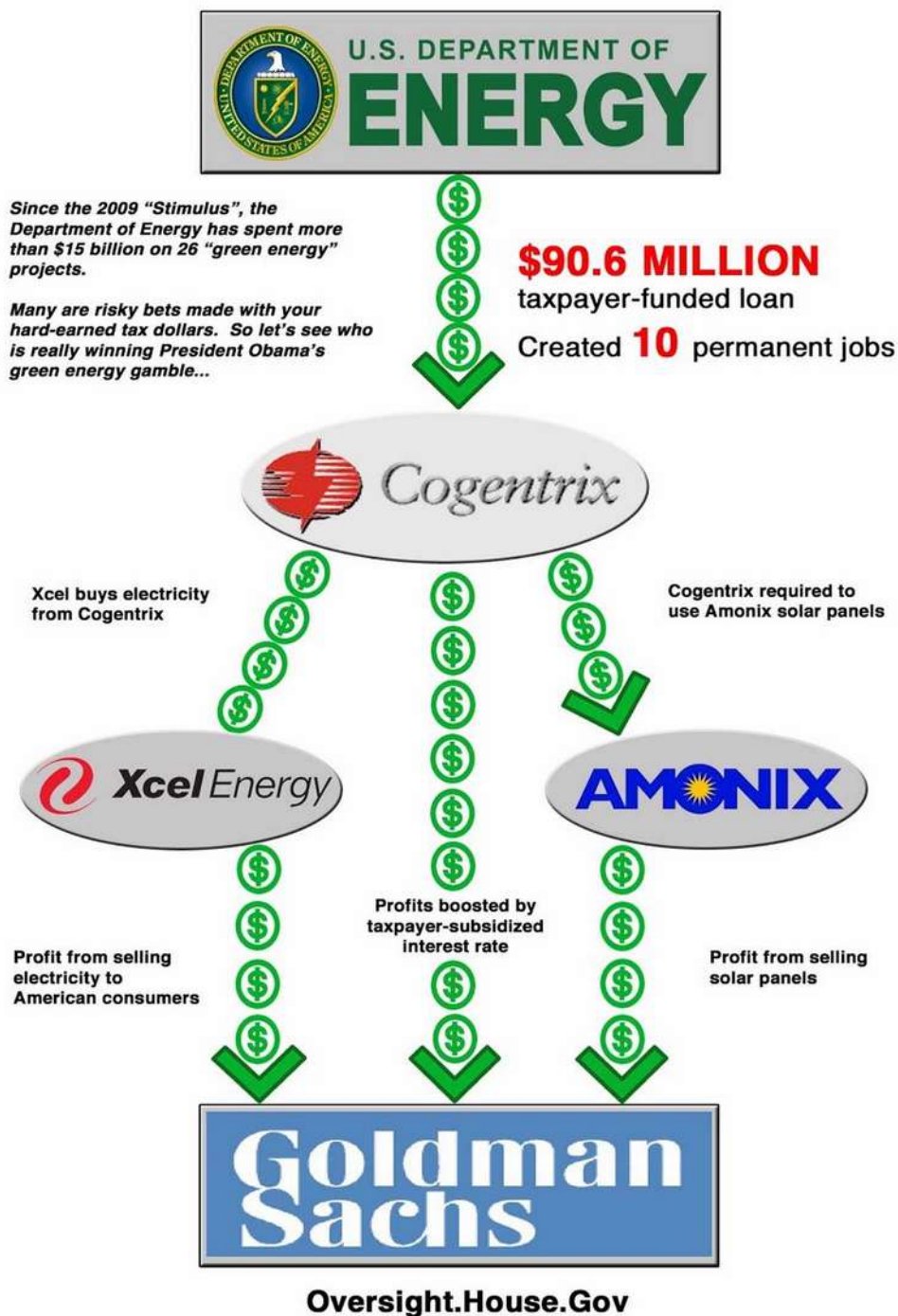
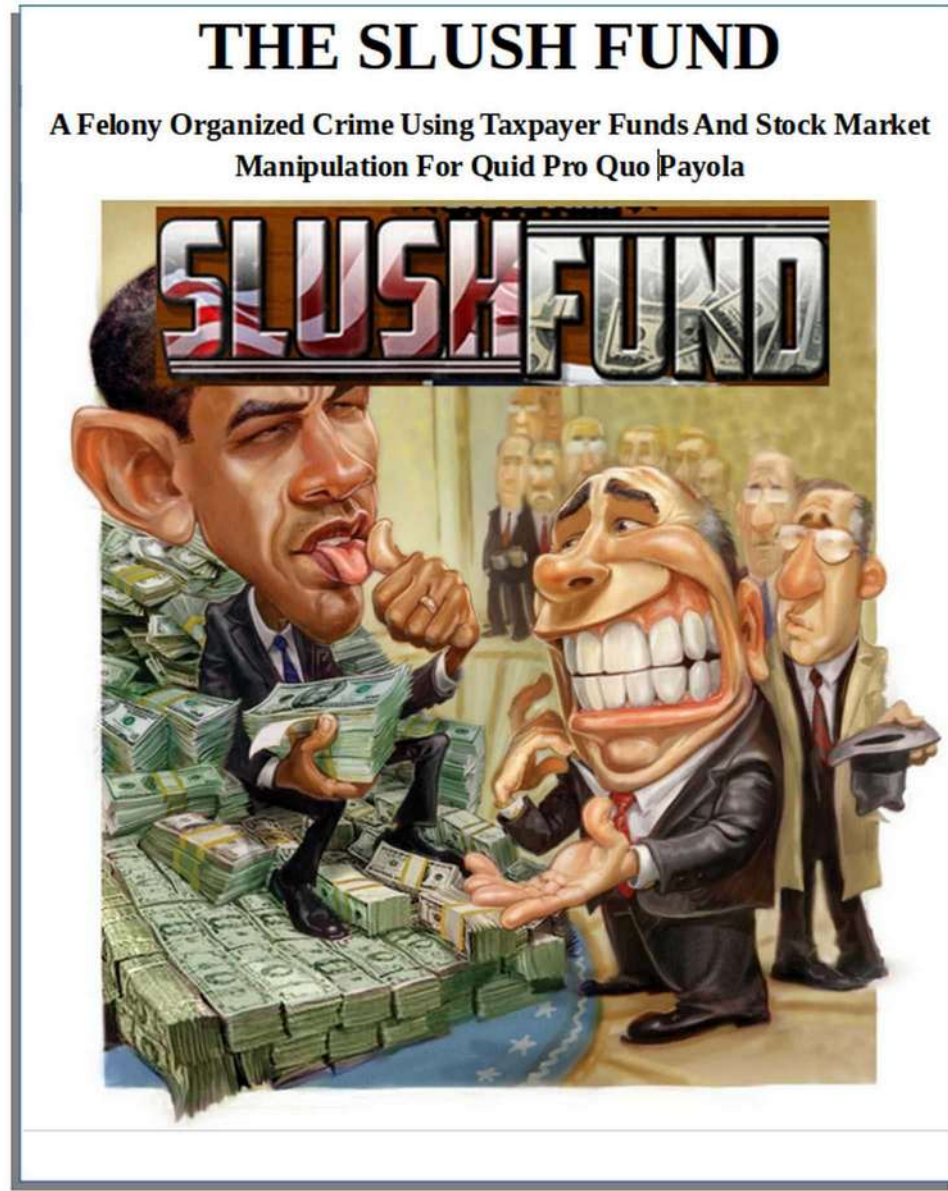


Figure 11: Feinstein's family works for, owns and controls Tesla And Solyndra profits

# Who Wins the White House "Green Energy" Gamble?



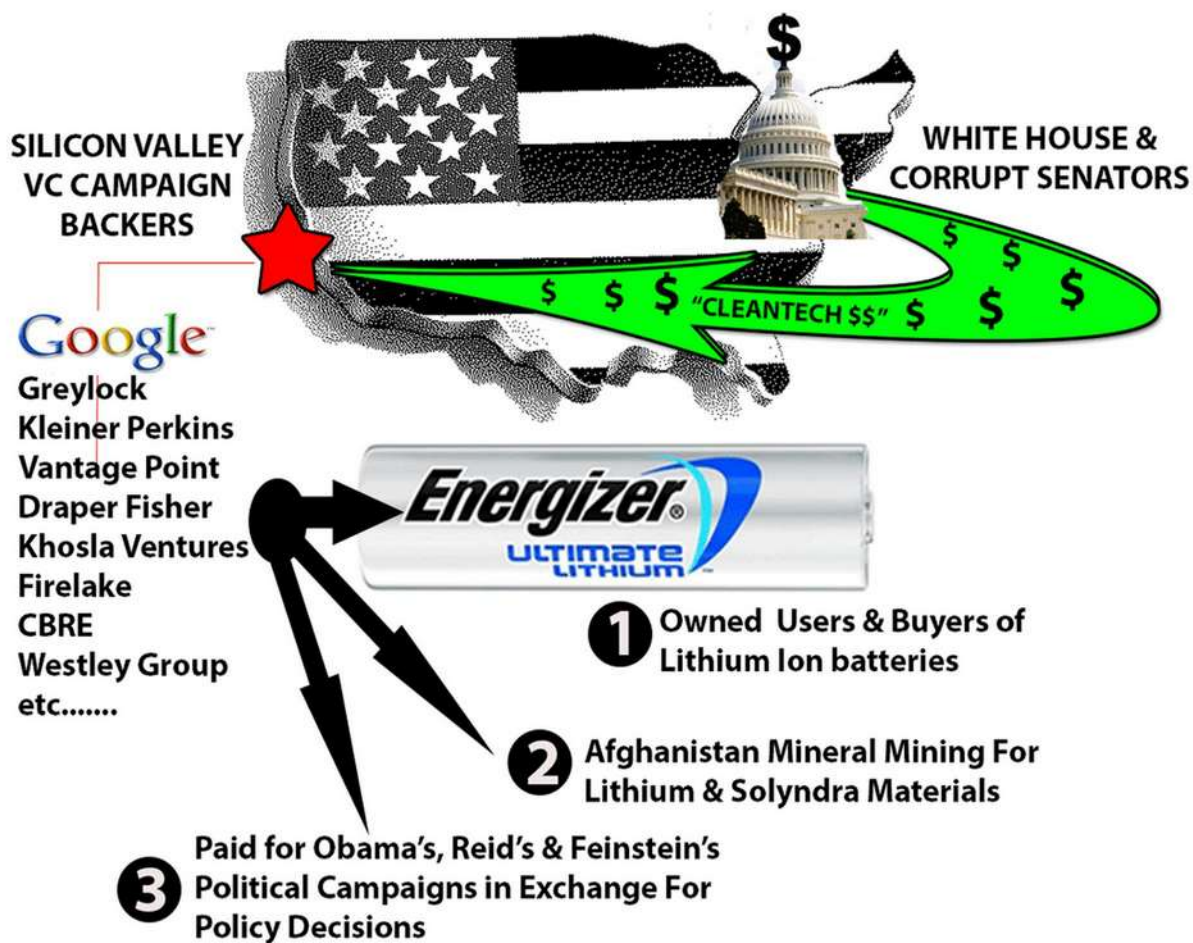
SEE THIS BOOK AS EVIDENCE MATTER:



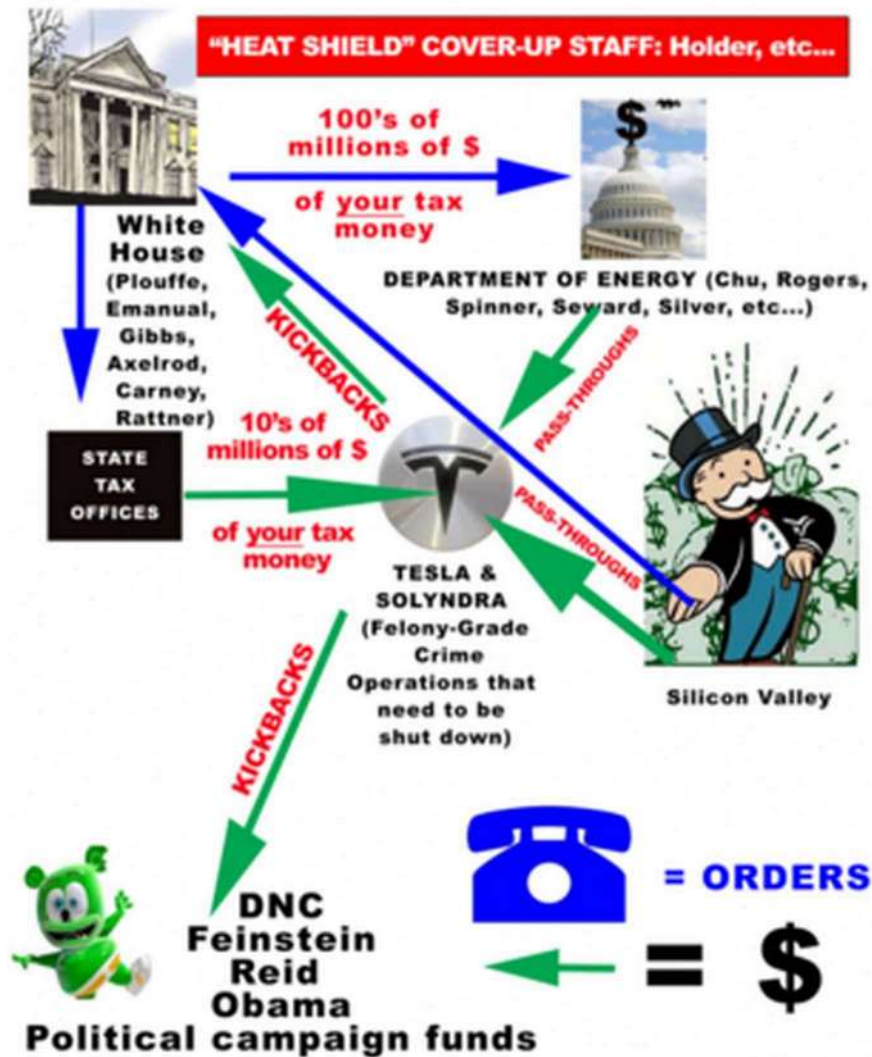


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## THE TESLA TAX MONEY SCAM





# TESLA AND FEINSTEIN INFLUENCE AND BRIBE REGULATORS TO HIDE AND COVER-UP TESLA'S HUGE NUMBER OF SAFETY ISSUES AND FACTORY DEFECTS!

The Washington Post

## Tesla Model S Plaid erupts in flames and briefly traps owner after electronic doors fail, attorneys say

Faiz Siddiqui · 19 hrs ago

Like Comment Retweet Share

Like · 20 Comments · 385

A Tesla Model S Plaid erupted in flames as the owner was driving down the road on Tuesday, attorneys for the man said, briefly trapping him in the car after the electronically activated doors would



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## EXHIBIT 73 - References, Proof And Bibliography

Evidence Package #1 – <http://www.majestic111.com>

Reprisal List Of State Sponsored Attacks Against Plaintiffs

Damages Calculation Metrics Based On Court And Case Precedents

Related Court Cases List

Disabling Conditions Caused By The Attacks And Frauds

Plaintiffs Character Witness Evidence, Credentials And Work History

Plaintiffs Law Enforcement, Sting Ops And IC Career Credentials

Feature film named “**Omerta**” (provided as web link)

Congressional report on GOVT LGP program corruption

<https://amgreatness.com/2020/09/14/the-billionaire-backers-of-the-insurrection/>

GAO report set on mismanagement of GOVT funds by GOVT – Rusco

Bright Automotive public letter

<https://projects.propublica.org/graphics/afghan>

Past litigation goals, public disclosure wins and accomplishments

<https://www.oann.com/author-lee-smith-says-president-trumps-enemies-have-launched-a-permanent-coup/>

<http://www.pacer.gov>

<https://www.thecreepylines.com>

<https://www.icij.org>

<https://stopelonfromfailingagain.com>

<http://vcracket.weebly.com>

<https://www.transparency.org>

<https://www.judicialwatch.org>

<https://wikileaks.org>

Pg 1510 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 <https://causeofaction.org>  
2 <https://fusion4freedom.com/about-gcf/>  
3 <http://peterschweizer.com/>  
4 <http://globalinitiative.net>  
5 <https://fusion4freedom.com/the-green-corruption-files-archive/>  
6 <https://propublica.org>  
7 <https://www.allsides.com/unbiased-balanced-news>  
8 <http://wearethenewmedia.com>  
9 [http://ec.europa.eu/anti\\_fraud/index\\_en.html](http://ec.europa.eu/anti_fraud/index_en.html)  
10 <http://gopacnetwork.org/>  
11 <http://www.iaaca.org/News/>  
12 <http://www.interpol.int/Crime-areas/Corruption/Corruption>  
13 <http://www.icac.nsw.gov.au/>  
14 <http://www.traceinternational.org/>  
15 <http://www.oge.gov/>  
16 <https://ogc.commerce.gov/>  
17 <https://anticorruptionact.org/>  
18 <http://www.anticorruptionintl.org/>  
19 <https://represent.us/>  
20 [http://www.giaccentre.org/dealing\\_with\\_corruption.php](http://www.giaccentre.org/dealing_with_corruption.php)  
21 <http://www.acfe.com/>  
22 <https://www.oas.org/juridico/english/FightCur.html>  
23 <https://www.opus.com/international-anti-corruption-day-businesses/>  
24 <https://www.opengovpartnership.org/theme/anti-corruption>  
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<https://www.ethicalsystems.org/content/corruption>

<https://sunlightfoundation.com/>

<http://www.googletransparencyproject.org/>

<http://xyzcase.weebly.com>

<https://en.wikipedia.org/wiki/Angelgate>

<https://www.opensecrets.org/>

[https://en.wikipedia.org/wiki/High-Tech\\_Employee\\_Antitrust\\_Litigation](https://en.wikipedia.org/wiki/High-Tech_Employee_Antitrust_Litigation)

<http://www.projectveritasaction.com>

***Catch and Kill** By Ronan Farrow,*

[https://en.wikipedia.org/wiki/Catch\\_and\\_Kill:\\_Lies,\\_Spies,\\_and\\_a\\_Conspiracy\\_to\\_Protect\\_Predators](https://en.wikipedia.org/wiki/Catch_and_Kill:_Lies,_Spies,_and_a_Conspiracy_to_Protect_Predators)

***Permanent Record** By Edward Snowden,* <https://www.amazon.com/Permanent-Record-Edward-Snowden/dp/1250237238>

***Brotopia** By Emily Chang,* <http://brotopiabook.com/>

***Throw Them All Out** By Peter Schweizer,* <http://peterschweizer.com/books/throw-them-all-out/>

***The Circle** By David Eggers,* <https://archive.org/details/circle00dave>

***World Without Mind** By Franklin Foer,* <https://www.amazon.com/World-Without-Mind-Existential-Threat/dp/1101981113>

***A Journey into the Savage Heart of Silicon Valley** By Corey Pein,* <https://www.goodreads.com/book/show/35684687-live-work-work-work-die>

***Disrupted** By Dan Lyons,* <https://www.goodreads.com/book/show/26030703-disrupted>

***Chaos Monkeys** By Antonio García Martínez,* <https://www.antonioarciamartinez.com/chaos-monkeys/>

***The Creepy Line** By Matthew Taylor,* <https://www.thecreepyline.com/>

***The Cleantech Crash** By Leslie Stahl,* <https://www.cbsnews.com/news/cleantech-crash-60-minutes/>

***Congress: Trading stock** By Steve Kroft,* <https://www.cbsnews.com/news/congress-trading-stock-on-inside-information/>

1 FBI [form 302 reports](#) on this case ( [https://content.next.westlaw.com/Document/I5a46ff877ecc11e8a5b3e3d9e23d7429/View/](https://content.next.westlaw.com/Document/I5a46ff877ecc11e8a5b3e3d9e23d7429/View/FullText.html?contextData=%28sc.Default%29)  
2 [FullText.html?contextData=%28sc.Default%29](https://content.next.westlaw.com/Document/I5a46ff877ecc11e8a5b3e3d9e23d7429/View/FullText.html?contextData=%28sc.Default%29))

3  
4 The [Solyndra](#) case FBI files ( <https://www.judicialwatch.org/corruption-chronicles/fed-audit-confirms-govt-corruption-in-solyndra-deal/> )

5 Case # [11-CV-2509](#) ( <https://www.cand.uscourts.gov/judges/koh-lucy-h-lhk/in-re-high-tech-employee-antitrust-litigation/> )

7 Task force case # [xyz2020a](#) ( <http://www.case-xyz2020a.com/> )

8 The DOJ and FTC [high tech](#) cases:  
9 <https://www.nytimes.com/2020/09/03/us/politics/google-antitrust-justice-department.html>  
10 <https://www.ftc.gov/news-events/press-releases/2019/02/ftcs-bureau-competition-launches-task-force-monitor-technology>

11 Case # [20-03664](#) ( <https://www.insurancejournal.com/app/uploads/2020/06/brown-v-google.pdf> )

13 Case # [1:12-CV-00774-mms](#) and related cases and fbi/ftc/sec/fec case sub-set reports ( <https://thehill.com/blogs/congress-blog/the-administration/250109-a-case-study-in-pay-to-play-cronyism> )

15 [OMERTA FINAL.m4v](#) ( <http://american-corruption.com/OMERTA%20FINAL.m4v> )

17 <https://vimeo.com/452233943>

18 [http://testimony111.com/public/OMERTA\\_FINAL.m4v](http://testimony111.com/public/OMERTA_FINAL.m4v)

20 **DELETED** – The Book: <http://deletedbook.com/>

21 [Proof-1: One Set Of Evidence Proving The Assertions](#) ( <http://www.webco22.com/proof> )

23 [Proof-2: A Different Evidence Set Repository](#) ( <http://newsplus007.com/> )

24 [Reports: Documents Provided To Law Enforcement And Regulatory Agencies](#) ( <http://testimony111.com/> )

26 [Videos: Broadcast News Video Evidence Proving The Assertions](#) ( <http://newsplus007.com/VIDEOS/> )

[Photos, Memes And News Clippings About The Incident](http://newsplus007.com/VIDEOS/) ( <http://newsplus007.com/VIDEOS/> )

[Submitted To Congressional Investigators](http://newsplus007.com/secrets/) ( <http://newsplus007.com/secrets/> )

[More News Videos Proving The Assertions Of Organized Crime And Corruption](http://evidencevideos.com/) ( <http://evidencevideos.com/> )

[The Perps - Who Ran These Crimes? THESE ARE THEIR NAMES!](https://newsplus007.com/public/Key_Perpetrators_List_A_For_FBI_And_Investigation_Task_Force.pdf) ( [https://newsplus007.com/public/Key\\_Perpetrators\\_List\\_A\\_For\\_FBI\\_And\\_Investigation\\_Task\\_Force.pdf](https://newsplus007.com/public/Key_Perpetrators_List_A_For_FBI_And_Investigation_Task_Force.pdf) )

[Inside The Google Empire](https://www.thecreepylines.com/) ( <https://www.thecreepylines.com/> )

[How Silicon Valley Rips Off Inventors](https://www.usinventor.org/) ( <https://www.usinventor.org/> )

[Meet Some Of Plaintiffs Investigators](http://www.ICIJ.org/) ( <http://www.ICIJ.org/> )

[The Mobsters of Tech](https://vcracket.weebly.com/) ( <https://vcracket.weebly.com/> )

[Investigating Political Corruption](http://testimony111.com/) ( <http://testimony111.com/> )

[Who does Your Senator Hire To Put Hit Jobs On Political Opposition?](http://AMERICAN-CORRUPTION.COM/) ( <http://AMERICAN-CORRUPTION.COM/> )

[Reports On The Corruption](http://AMERICAN-CORRUPTION.COM/) ( <http://AMERICAN-CORRUPTION.COM/> )

[HOW TO END POLITICAL CORRUPTION FOREVER](http://american-corruption.com/HOW%20THE%20PUBLIC%20IS%20ENDING%20POLITICAL%20CORRUPTION%20FOREVER%202.2.pdf) ( <http://american-corruption.com/HOW%20THE%20PUBLIC%20IS%20ENDING%20POLITICAL%20CORRUPTION%20FOREVER%202.2.pdf> )

NSA surveillance archives per each perpetrator mentioned herein

FBI surveillance archives per each perpetrator mentioned herein

FSB surveillance archives per each perpetrator mentioned herein

Aalberts, Robert J. & Marianne M. Jennings. 1999. The Ethics of Slotting: Is this Bribery, Facilitation Marketing or Just Plain Competition? Journal of Business Ethics

Aaronson, S.A. 2011. Limited Partnership: Business, Government, Civil Society and the

Pg 1514 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Public in the Extractive Industries Transparency Initiative. Public Administration & Development

Aaronson, Susan Ariel & M. Rodwan Abouharb. 2014. "Corruption, Conflicts of Interest and the WTO", in Jean-Bernard Auby, Emmanuel Breen & Thomas Perroud eds., Corruption and Conflicts of Interest: A Comparative Law Approach

Aaronson, Susan Ariel. 2014. does the WTO Help Nations Clean Up? The WTO as an Anticorruption Counterweight. World Trade Review (forthcoming).

Abbink, Klaus & Danila Serra. 2012. "Anticorruption Policies: Lessons from the Lab," in Danila Serra & Leonard Wantchekon, eds., New Advances in experimental Research on Corruption (Emerald Books)

Abbink, Klaus & Heike Hennig-Schmidt. 2006. Neutral versus Loaded Instructions in a Bribery Game. experimental Economics

Abbink, Klaus & K. Wu. 2013. Reward Self-Reporting to Deter Corruption: An experiment on Mitigating Collusive Bribery. Monash University, Discussion Paper

Abbink, Klaus & Matthew Ellman. 2010. The Donor Problem: An experimental Analysis of Beneficiary Empowerment. Journal of Development Studies

Abbink, Klaus, Bernd Irlenbusch & Elke Renner. 2002. An experimental Bribery Game, Journal of Law, Economics & Organization

Abbink, Klaus, Utteeyo Dasgupta, Lata Ghanghadaran & Tarun Jain. 2014. Letting the Briber Go Free: An experiment on Mitigating Harassment Bribes. Journal of Public Economics 111

Abbink, Klaus. 2004. Staff Rotation as an Anticorruption Policy: An experimental Study. European Journal of Political Economy

Abbink, Klaus. 2005. "Fair Salaries and the Moral Costs of Corruption," in Kokinov & Boicho eds., Advances in Cognitive Economics (Sofia: NBU Press).

Abbink, Klaus. 2006. "Laboratory experiments on Corruption," in Susan Rose-Ackerman ed. International Handbook on the Economics of Corruptions

Abbott, Kenneth W. & Duncan Snidal. 2002. "International Action on Bribery and Corruption: Why the Dog Didn't Bark in the WTO", in Daniel M. Kennedy & James D.

Southwick eds., The Political Economy of International Trade Law.

Abbott, Kenneth W. & Duncan Snidal. 2002. Values and Interests: International

Legalization in the Fight against Corruption. Journal of Legal Studies 31(S1)

Abbott, Kenneth W. 2001. Rule Making in the WTO: Lessons from the Case of Bribery and Corruption. Journal of International Economic Law 4(2)

- 1 Abbott, Kenneth W. 2009. "Fight Against Corruption," in Max Planck Encyclopedia of  
International Law.
- 2
- 3 Abdalla, H.F., A.S. Maghrabi & B.G. Raggad. 1998. Assessing the Perceptions of Human  
Resource Managers Toward Nepotism: A Cross-Cultural Study. International Journal of Manpower
- 4
- 5 Abdallah, Sherief, Rasha Sayed, Iyad Rahwan, Brad L. LeVeck, Manuel Cebrian, Alex  
Rutherford & James H. Fowler. 2014. Corruption Drives the Emergence of Civil Society.  
Journal of the Royal Society
- 6
- 7 Abdulai, A.G. 2009. Political Will in Combating Corruption in Developing and Transition  
Countries: A Comparative Study of Singapore, Hong Kong and Ghana.  
Journal of Financial Crime 4
- 8
- 9
- 10 Abed, George T. & Hamid R. Davoodi. 2000. Corruption, Structural Reforms, and  
Economic Performance in the Transition Economies. IMF Working Paper No. 00/132.
- 11
- 12 Abed, George T. & Sanjeev Gupta. 2002. Governance, Corruption, and Economic  
Performance. Washington, D.C.: International Monetary Fund.
- 13
- 14 Abidin, I.S.Z., M.D. Jantan., N.M. Satar & M. Haseeb. 2014. Trade Linkages between  
Malaysia and the OIC Member Countries: Empirical Evidence Based on a Gravity Model.  
American Journal of Applied Sciences
- 15
- 16 Abiona, I.A. & O. Savage. 2014. Influence of Independent Corrupt Practices and Other  
Related Offences Commission on Female Civil Servants in Oyo State, Nigeria. Public Policy &  
Administration Research
- 17
- 18 Abrams, Norman, Sara Sun Beale & Susan Riva Klein. 2010 Federal Criminal Law and Its  
Enforcement (5th edition).
- 19
- 20 Abrams, Norman. 2011. The Distance Imperative: A Different Way of Thinking about  
Public Official Corruption Investigations/Prosecutions and the Federal Role. Loyola University  
Chicago Law Journal 42
- 21
- 22 Abrate, G., F. Erbetta, G. Fraquelli & D. Vannoni. 2015. The Cost of Corruption in the  
Italian Solid Waste Industry. Industrial & Corporate Change
- 23
- 24 Abtidon, A.H. 2015. The Impact of Financial Accountability on Reducing Corruption in  
Mogadishu Somalia. Academic Research International
- 25
- 26 Abu, N., M. Karim & M. Aziz. 2015. Corruption, Political Instability and Economic  
Development in the Economic Community of West African States (ECOWAS): Is There a Causal  
Relationship? Contemporary Economics
- 27
- 28 Abu, N., M. Karim & M. Aziz. 2015. Low Savings Rates in the Economic Community of  
West African States (ECOWAS): The Role of Corruption. Journal of Economic Cooperation and

## Development

Abu-Shanab, Emad A., Yousra A. Harb & Suhaib Y. Al-Zoubi. 2013. E-Government as an Anti-Corruption Tool: Citizens Perceptions. *International Journal of Electronic Governance*

Acar, Muhittin & Ugur Emek. 2009. "Preventing Corruption in Turkey: Issues, Instruments, and Institutions", in Gong, T. & S.K. Ma eds., *Preventing Corruption in Asia: Institutional Design and Policy Capacity* (London: Routledge)

Acconcia, Antonio & Claudia Cantabene. 2008. A Big Push To Deter Corruption: Evidence from Italy. *Giornale degli Economisti*

Acconcia, Antonio, Giovanni Immordino, Salvatore Piccolo & Patrick Rey. 2009.

Accomplice-Witnesses, Organized Crime and Corruption: Theory and Evidence from Italy. (CSEF Working Paper No. 232)

Acconcia, Antonio, Marcello D'Amato & Ricardo Martina. 2003. Corruption and Tax Evasion with Competitive Bribes. (CSEF Working Paper No. 112).

Acconcia, Antonio, Marcello D'Amato & Riccardo Martina. 2010. Tax Evasion and Corruption: Endogenous Deterrence and the Perverse Effects of Fines. *Studi Economici* 101

Acemoglu, D., J. Robinson & T. Verdier. 2004. Kleptocracy and Divide-and-Rule: A Model of Personal Rule. *Journal of the European Economic Association*

Acemoglu, Daron & Thierry Verdier. 1998. Property Rights, Corruption and the Allocation of Talent: A General Equilibrium Approach. *The Economic Journal* 108

Acemoglu, Daron, & Thierry Verdier. 2000. The Choice between Market Failures and Corruption. *American Economic Review*.

Acemoglu, Daron. 1995. Reward Structure and the Allocation of Talent. *European Economic Review* 39

Acharya, Avidit, John E. Roemer & Rohini Somanathan. 2015. Caste, Corruption and Political Competition in India. *Research in Economics*

Acht, M., T.O. Mahmoud & R. Thiele. 2015. Corrupt Governments Do Not Receive More State-to-State Aid: Governance and the Delivery of Foreign Aid Through Non-State Actors. *Journal of Development Economics*

Achua, J.K. 2011. Anti-Corruption in Public Procurement in Nigeria: Challenges and Competency Strategies. *Journal of Public Procurement*

Ackerman, John M. 2014. Rethinking the International Anti-Corruption Agenda: Civil Society, Human Rights and Democracy. *American University International Law Review*

Adam, A., M.D. Delis & P. Kammass. 2014. Fiscal Decentralization and Public Sector

Efficiency: Evidence from OECD Countries. Economics of Governance

ADB/OECD Anti-Corruption Initiative for Asia and the Pacific. 2007. Mutual Legal Assistance, Extradition and Recovery of Proceeds of Corruption in Asia and the Pacific.

Adebanwi, Wale & Ebenezer Obadare. 2011. When Corruption Fights Back: Democracy and Elite Interest in Nigeria's Anti-Corruption War. Journal of Modern African Studies

Ades, Alberto & Rafael Di Tella. 1997. The New Economics of Corruption: A Survey and Some New Results. Political Studies

Ades, Alberto & Rafael Di Tella. 1997. National Champions and Corruption: Some Unpleasant Interventionist Arithmetic. Economic Journal

Ades, Alberto & Rafael Di Tella. 1999. Rents, Competition, and Corruption. American Economic Review

Adeyeye, Adefolake O. 2012. Corporate Social Responsibility of Multinational Corporations in Developing Countries: Perspectives on Anti-Corruption (Cambridge University Press).

Adsera, Alicia, Carles Boix & Mark Payne. 2003. Are You Being Served? Political Accountability and Quality of Government. Journal of Law, Economics & Organization

Adut, Ari. 2004. Scandal as Norm Entrepreneurship Strategy: Corruption and the French Investigating Magistrates. Theory and Society

Afonso, A., L. Schuknecht & V. Tanzi. 2005. Public Sector Efficiency: An International Comparison. Public Choice

Afridi, Farzana. 2008. Can Community Monitoring Improve the Accountability of Public Officials? Economic & Political Weekly

Agbibo, Daneil E. 2014. Under-Development in Practice: Nigeria and the Enduring Problem of Corruption. Development in Practice

Agbibo, Daniel E. 2010. The Corruption-Underdevelopment Nexus in Africa: Which Way Nigeria? Journal of Social, Political & Economic Studies

Agbibo, Daniel E. 2011. Leaders or Leeches: Corruption and the Cycle of Dysfunction in Nigeria. Loyola Journal of Social Sciences

Agbibo, Daniel E. 2012. Between Corruption and Development: The Political Economy of State Robbery in Nigeria. Journal of Business Ethics

Agbibo, Daniel E. 2012. Serving the Few, Starving the Many: How Corruption Underdevelops Nigeria and How There Is an Alternative Perspective to Corruption Cleanups. Africa Today

Pg 1518 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 Agbiboa, Daniel E. 2013. Corruption and Economic Crime in Nigeria: Social and Economic  
2 Perspectives. African Security Review

3 Agbiboa, Daniel E. 2015. Protectors or Predators? The Embedded Problem of Police  
4 Corruption and Deviance in Nigeria. Administration & Society

5 Agbiboa, Daniel. 2013. One Step Forward, Two Steps Back: The Political Culture of  
6 Corruption and Cleanups in Nigeria. CEU Political Science Journal

7 Agur, C. 2015. Second-Order Networks, Gambling, and Corruption on Indian Mobile Phone  
8 Networks. Media, Culture & Society 37(5): 768-.

9 Ahlin, Christian R. & Jiaren Pang. 2008. Are Financial Development and Corruption  
10 Control Substitutes in Promoting Growth? Journal of Development Economics

11 Ahlin, Christian R. & Pinaki Bose. 2007. Bribery, Inefficiency, and Bureaucratic Delay.  
12 Journal of Development Economics

13 Ahlin, Christoher. 2005. Effects and (In)Tractability of Decentralized Corruption. (Working  
14 paper).

15 Ahmad Kai, A.H., R. Haniffa, M. Hudaib & M.N.A. Karim. 2015. Neopatrimonialism,  
16 Crony Capitalists and the Production of Corruption in Malaysia. Accounting Forum.

17 Ahmad, N. & O.T. Brookins. 2004. On Corruption and Countervailing Actions in Three  
18 South Asian Nations. Journal of Policy Reform

19 Ahmad, N. 2002. Corruption and Government Regulations: An Empirical Analysis.  
20 Bangladesh Development Studies

21 Ahmadi, Cyavash Nasir. 2012. Regulating the Regulators: A Solution to Foreign Corrupt  
22 Practices Act Woes. Journal of International Business & Law

23 Ahmed, A., S.A. Lodhi & M. Ahmad. 2015. Using Split-Questionnaire Design: An Empirical  
24 Analysis. Pakistan Journal of Statistics

25 Ahmed, Naved 2001. Corruption Perceptions Indices: A Comparative Analysis. Pakistan  
26 Development Review

27 Ahmed, R. & Q.M. Ahmed. 2012. Petty Corruption in the Police Department: A Case Study  
28 of Slum Areas of Karachi. Developing Country Studies

Ahmen, Samiul Parvez & G.M. Wali Ullah. 2014. Global Corruption Hoax: Politicization of  
the Concept of Corruption and the Issues of Corruption Measurement Indices. Journal Economics &  
Sustainable Development

Ahrend, Rudiger. 2002. Press Freedom, Human Capital, and Corruption. DELTA Working



Paper 11.

Aidt, T.S. & M. Gassebner. 2007. Do Autocratic States Trade Less? Working paper.

Aidt, Toke S. & Jayasri Dutta. 2008. Policy Compromises: Corruption and Regulation in a Democracy. Economics and Politics

Aidt, Toke S. 2003. Economic Analysis of Corruption: A Survey. Economic Journal 113: F632-F652.

Aidt, Toke S. 2009. Corruption, Institutions, and Economic Development. Oxford Review of Economic Policy

Aidt, Toke S. 2011. "Corruption and Sustainable Development", in Susan Rose-Ackerman & Tina Soreide eds., The International Handbook on the Economics of Corruption, Vol. 2 (Edward Elgar Publishing).

Aidt, Toke S. 2011. The Causes of Corruption. CESifo DICE Report

Aidt, Toke, Jayasri Dutta & Vania Sena. 2008. Governance Regimes, Corruption and Growth: Theory and Evidence. Journal of Comparative Economics

Ajayi, Konyin. 1997. On the Trail of a Spectre—Destabilisation of Developing and Transitional Economies: A Case Study of Corruption in Nigeria. Dickinson Journal of International Law

Akbar, Y. & V. Vujic. 2014. explaining Corruption: The Role of National Culture and its Implications for International Management. Cross Cultural Management

Akca, Hasim, Ahmet Yilmaz Ata & Coskun Karaca. 2012. Inflation and Corruption Relationship: Evidence from Panel Data in Developed and Developing Countries.

International Journal of Economics & Financial Issues

Akcay, Selcuk. 2006. Corruption and Human Development. Cato Journal

Akhter, Syed H. 2004. Is Globalization What It's Cracked Up to Be? Economic Freedom, Corruption, and Human Development. Journal of World Business

Akinboade, O.A. 2014. Regulation, SMEs' Growth and Performance in Cameroon's Central and Littoral Provinces' Manufacturing and Retail Sectors. African Development Review

Aklin, M., P. Bayer, S. Harish & J. Urpelainen. 2014. Who Blames Corruption for the Poor Enforcement of Environmental Laws? Survey Evidence from Brazil. Environmental Economics & Policy Studies

Aklin, M., P. Bayer, S.P. Harish & J. Urpelainen. 2015. Quantifying Slum Electrification in India and explaining Local Variation. Energy

Pg 1520 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Ala'i, P. 2014. Civil Consequences of Corruption in International Commercial Contracts.
- 2 American Journal of Comparative Law 62: .
- 3 Ala'i, Padideh. 2000. The Legacy of Geographical Morality and Colonialism: A Historical
- 4 Assessment of the Current Crusade Against Corruption. Vanderbilt Journal of Transnational Law
- 5 Ala'i, Padideh. 2009. The WTO and the Anti-Corruption Movement. Loyola University
- 6 Chicago International Law Review
- 7 Alam, M. Shahid. 1989. Anatomy of Corruption: An Approach to the Political Economy of
- 8 Underdevelopment. American Journal of Economics and Sociology 48(4): 441-456.
- 9 Alam, M. Shahid. 1990. Some Economic Costs of Corruption in LDCs. Journal of
- 10 Development Studies
- 11 Alam, M. Shahid. 1995. A Theory of Limits on Corruption and Some Applications.
- 12 Kyklos 48:
- 13 Alarcon Lopez, Paola. 2014. Constitutional Design and Political Agency Problems: The
- 14 Case of Colombia. Con-Texto: Revista de Derecho y Economia
- 15 Alatas, Vivi, Abhijit Banerjee, Rema Hanna, Benjamin A. Olken, Ririn Purnamasari &
- 16 Matthew Wai-Poi. 2013. does Elite Capture Matter? Local Elites and Targeted Welfare Programs in
- 17 Indonesia. Working paper.
- 18 Alatas, Vivi, Lisa Cameron, Ananish Chaudhuri, Nisvan Erkal & Lata Gangadharan.
- 19 2009. Subject Pool Effects in a Corruption experiment: A Comparison of Indonesian Public
- 20 Servants and Indonesian Students. experimental Economics
- 21 Alatas, Vivi, Lisa Cameron, Ananish Chaudhuri, Nisvan Erkal & Lata Gangadharan.
- 22 2009. Gender, Culture, and Corruption: Insights from an experimental Analysis. Southern
- 23 Economic Journal
- 24 Aldashev, Gani. 2015. Voter Turnout and Political Rents. Journal of Public Economic
- 25 Theory
- 26 Alderman, Richard. 2013. B20 Task Force on Improving Transparency and Anti-Corruption:
- 27 Development of a Preliminary Study on Possible Regulatory Developments to Enhance the Private
- 28 Sector Role in the Fight Against Corruption in a Global Business Context.
- Aldrichi, Dante Mendes. 2011. "Risks of Wrongdoing in Public Companies and Ways to
- Cope with Them: The Case of Brazil", in International Handbook on the Economics of Corruption,
- Vol. II. (Edward Elgar Publishing).
- Aleksynka, M. & O. Havrylchyk. 2013. FDI from the South: The Role of Institutional

Distance and Natural Resources. European Journal of Political Economy

Alemu, Aye Mengistu. 2012. Effects of Corruption on FDI Inflow in Asian Economies.

Seoul Journal of Economics

Alence, Rod. 2004. Political Institutions and Developmental Governance in Sub-Saharan Africa. Journal of Modern African Studies

Alesina, Alberto & Beatrice Weder. 2002. Do Corrupt Governments Receive Less Foreign Aid? American Economic Review

Alesina, Alberto & George-Marios Angeletos. 2005. Corruption, Inequality, and Fairness. Journal of Monetary Economics

Alesina, Alberto & George-Marios Angeletos. 2005. Fairness and Redistribution.

American Economic Review

Alesina, Alberto & Romain Wacziarg. 1998. Openness, Country Size, and Government.

Journal of Public Economics

Alesina, Alberto, Arnaud Devleeschauwer, William Easterly, Sergio Kurlat & Romain Wacziarg. 2003. Fractionalization. Journal of Economic Growth

Aleston, Lee J. & Andres A. Gallo. 2010. Electoral Fraud, the Rise of Peron and Demise of Checks and Balances in Argentina. explorations in Economic History

Alexander, C.R. & M.A. Cohen. 2015. The Evolution of Corporate Criminal Settlements: An Empirical Perspective on Non-Prosecution, Deferred Prosecution, and Plea Agreements. American Criminal Law Review

Alexeev, Michael & Luba Habodaszova. 2012. Decentralization, Corruption, and the Shadow Economy. Public Finance & Management

Alexeev, Michael & Robert Conrad. 2009. The Elusive Curse of Oil. Review of Economics & Statistics

Alexeev, Michael & Robert Conrad. 2011. The Natural Resource Curse and Economic Transition. Economic Systems

Alexeev, Michael & Yunah Song. 2013. Corruption and Product Market Competition: An Empirical Investigation. Journal of Development Economics

Alfano, M.R. & A.L. Baraldi. 2015. Is There an Optimal Level of Political Competition in Terms of Economic Growth? Evidence from Italy? European Journal of Law & Economics

Alford, John, Holly Teeters, Daniel S. Ward & Rick K. Wilson. 1994. Overdraft: The

Political Cost of Congressional Malfeasance. Journal of Politics

Alford, Roger P. 2012. A Broken Windows Theory of International Corruption. Ohio State Law Journal

Alhassan-Alolo, N. 2007. Gender and Corruption: Testing the New Consensus. Public Administration & Development

Ali, Abdiweli M. & Hodan Said Isse. 2003. Determinants of Economic Corruption: A Cross-Country Comparison. Cato Journal

Alldrige, Peter. 2012. The U.K. Bribery Act: “The Caffeinated Younger Sibling of the FCPA”. Ohio State Law Journal

Alldrige, Peter. 2014. Tax Avoidance, Tax Evasion, Money Laundering and the Problem of “Offshore”. Working paper.

Alldrige, Peter. 2015. “Tax Avoidance, Tax Evasion, Money Laundering and the Problem of ‘Offshore’”, in Susan Rose-Ackerman & Paul Lagunes eds., Greed, Corruption, and the Modern State

Allen, N. & S. Birch. 2011. Political Conduct and Misconduct: Probing Public Opinion. Parliamentary Affairs

Allen, N. 2015. From Patronage Machine to Partisan Melee: Subnational Competition and the Evolution of the Indonesian Party System. Pacific Affairs

Allen, N.W. 2014. From Patronage Machine to Partisan Melee: Subnational Corruption and the Evolution of the Indonesian Party System. Pacific Affairs

Allen, N.W. 2015. Clientalism and the Personal Vote in Indonesia. Electoral Studies

Al-Mahayreh, M. & M. Abedel-Qader. 2015. Identifying the Impact of Administrative Transparency on the Administrative Corruption: A Study on the Employees of Grand Amman Municipality. Advances in Management & Applied Economics

Al-Marhubi, F.A. 2000. Corruption and Inflation. Economics Letters

Almond, Michael A. & Scott D. Syfert. 1997. Beyond Compliance: Corruption, Corporate Responsibility and Ethical Standards in the New Global Economy. N.C. J. Int’l L. & Com. Reg

Alolo, Amawu Alhassan. 2007. “Fighting Public Sector Corruption in Ghana: does Gender Matter?”, in Sarah Bracking ed., Corruption and Development: The Anti-Corruption Campaigns (Palgrave Macmillan)

Alon, A. & A. Hageman. 2013. The Impact of Corruption on Firm Tax Compliance in Transition Economies: Whom Do You Trust? Journal of Business Ethics

Al-Sadig, Ali. 2009. The Effects of Corruption on FDI Inflows. Cato Journal

Pg 1523 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Alt, James E. & David Dryer Lassen. 2003. The Political Economy of Institutions and Corruption in American States, *Journal of Theoretical Politics* 15:341-65.

Alt, James E. & David Dryer Lassen. 2008. Political and Judicial Checks on Corruption: Evidence from American State Governments. *Economics & Politics*

Alt, James E. & David Dryer Lassen. 2014. Enforcement and Public Corruption: Evidence from the American States. *Journal of Law, Economics & Organization*

Altamirano, Giorleny D. 2007. "The Impact of the Inter-American Convention against

Corruption," *The University of Miami Inter-American Law Review*

Altunbas, Y. & J. Thornton. 2012. Fiscal Decentralization and Governance. *Public Finance Review*

Amacher, G.S. 2006. Editorial: Corruption: A Challenge for Economists Interested in Forest Policy Design. *Journal of Forest Economics*

Ameen, Ali Abdulbaqi & Kamsuriah Ahmad. 2013. A Conceptual Framework of Financial Information Systems to Reduce Corruption. *Journal of Theoretical & Applied Information Technology*

Ameyaw, E.F. & A.P.C. Chan. 2015. Evaluating Key Risk Factors for PPP Water Projects in Ghana: A Delphi Study. *Journal of Facilities Management*

Amir, R. & C. Burr. 2015. Corruption and Socially Optimal Entry. *Journal of Public Economics*

Amone, Marco & Leandro S. Borlini. 2014. Corruption: Economic Analysis and International Law .

Amore, Mario Daniele & Morten Bennedsen. 2013. The Value of Local Political Connections in a Low-Corruption Environment. *Journal of Financial Economics* (forthcoming).

Amundsen, Inge. 2013. "'Pay Up and Off You Go!': Buying Political Positions in Bangladesh", in Soreide, Tina & Aled Williams eds., *Corruption, Grabbing and Development*

Anand, Vikas, Blake E. Ashforth & Mahendra Joshi. 2005. Business as Usual: The Acceptance and Perpetuation of Corruption in Organizations. *Academy of Management Executive*

Anbarci, N., M. Escaleras & C. Register. 2006. Traffic Fatalities and Public Sector Corruption. *Kyklos*.

Anbarci, Nejat, Monica Escaleras & Charles A. Register. 2009. The Ill Effects of Public Sector Corruption in the Water and Sanitation Sector. *Land Economics*

Anders, G. 2015. The Normativity of Numbers in Practice: Technologies of Counting, Accounting and Auditing in Malawi's Civil Service Reform. *Social Anthropology*

1 Andersen, J.J. & M.L. Ross. 2014. The Big Oil Change: A Closer Look at the Haber-  
2 Menaldo Analysis. Comparative Political Studies

3 Andersen, J.J. & S. Aslaksen. 2008. Constitutions and the Resource Curse. Journal of  
4 Development Economics

5 Andersen, Jorgen Juel, Niels Johannesen, David Dreyer Lassen & Elena Paltseva. 2014.

6 Petro Rents, Political Institutions, and Hidden Wealth: Evidence from Offshore Bank  
7 Accounts. Working paper.

8 Andersen, Thomas Barnebeck, Jeanet Bentzen, Carl-Johan Dalgaard & Pablo Seleya.

9 2011. does the Internet Reduce Corruption? Evidence from U.S. States and Across  
10 Countries. World Bank Economic Review 25(3): 387-417.

11 Andersen, Thomas Barnebeck. 2009. E-Government as an Anti-Corruption Strategy.

12 Information Economics & Policy

13 Anderson, B.B. 2015. Corrupting Activities and Economic Development. World Journal of  
14 Entrepreneurship, Management & Sustainable Development

15 Anderson, Christopher J. & Yuliya V. Tverdova. 2003. Corruption, Political Allegiances,  
16 and Attitudes toward Government in Contemporary Democracies. American Journal of  
17 Political Science

18 Anderson, James & Douglas Marcouiller. 2002. Insecurity and the Pattern of Trade: An  
19 Empirical Investigation. Review of Economics & Statistics

20 Anderson, James & Douglas Marcouiller. 2005. Anarchy and Autarky: Endogenous  
21 Predation as a Barrier to Trade. International Economic Review

22 Anderson, James, Daniel Kaufmann & Francesca Recanatini. 2003. Service Delivery,  
23 Poverty and Corruption—Common Threads from Diagnostic Surveys. Working paper.

24 Anderson, Robert, William Kovacic & Anna Caroline Miller. 2011. “Ensuring Integrity and  
25 Competition in Public Procurement Markets: A Dual Challenge for Good Governance”, in Sue  
26 Arrowsmith & Robert Anderson eds., The WTO Regime on Government Procurement: Challenge  
27 and Reform. Cambridge University Press.

28 Andersson, Staffan & Frank Anechiarico. 2015. “The Political Economy of Conflicts of  
Interest in an Era of Public-Private Governance” , in Paul M. Heywood ed., The Routledge  
Handbook of Political Corruption (New York: Routledge)

Andersson, Steffan & Paul M. Heywood. 2009. The Politics of Perception: Use and Abuse  
of Transparency International’s Approach to Measuring Corruption. Political Studies

1           Andersson, Steffan & Paul M. Heywood. 2010. "Anti-Corruption as a Risk to Democracy:  
2 On the Unintended Consequences of International Anti-Corruption Campaigns", in L. de Sousa et  
3 al. eds., *Governments, NGOs and Anti-Corruption: The New Integrity Warriors*. Routledge.

4           Andreas, Peter. 1998. *The Political Economy of Narco-Corruption in Mexico*. Current  
5 History.

6           Andrei, T., S. Stancu, M. Nedelcu & A. Matei. 2009. *Econometric Models Used for the  
7 Corruption Analysis*. Economic Computation & Economic Cybernetics Studies & Research

8           Andrei, Tudorel, Ani Matei & Bogdan Oancea. 2009. *Simultaneous Equation Models Used  
9 in the Study of Some Issues Related to the Corruption and Performance of Services in the Public  
10 Health System*. Theoretical & Applied Economics

11           Andrei, Tudorel, Ani Matei, Stelian Stancu & Bogdan Oancea. 2009. *Some Notes About  
12 Decentralization Process Implications on Public Administration Corruption in Romania*.

13           Prague Economic Papers 2009

14           Andreula, Nicolo, Alberto Chong & Jorge Guillen. 2009. *Institutional Quality and Fiscal  
15 Transparency*. IDB Working Paper #IDP-WP-125.

16           Andrews, Josephine T. & Gabriella R. Montinola. 2004. *Veto Players and the Rule of Law  
17 in Emerging Democracies*. *Comparative Political Studies* 37(1): 55-87.

18           Andrews, Matthew & Anwar Shah. 2005. "Towards Citizen-Centered Local Budgets in  
19 Developing Countries," in Anwar Shah ed., *Public expenditure Analysis* (Washington, D.C.: World  
20 Bank).

21           Andrianova, Svetlana & Nicolas Melissas. 2009. *Corruption, Extortion, and the Boundaries  
22 of the Law*, *Journal of Law, Economics & Organization*

23           Andrianova, Svetlana. 2001. *Corruption and Reputation*. *Scottish Journal of Political  
24 Economy*

25           Andrianova, Svetlana. 2007. *On Corruption and Institutions in Decentralised Economies*.

26           B.E. *Journal of Theoretical Economics*

27           Androphy, B. 2015. *Understanding the Limited Authority of Ethics Commissions*. *Public  
28 Administration Review*

          Anduiza, Eva, Aina Gallego & Jordi Munoz. 2013. *Turning a Blind Eye: experimental  
Evidence of Partisan Bias in Attitudes Toward Corruption*. *Comparative Political Studies*

          Andvig, J. 2005. "experimental Economics and Corruption: A Survey of Budding  
Research", in Transparency International, *Global Corruption Report* (Cambridge, UK: Cambridge  
University Press)



Andvig, Jens Chr. & Odd-Helge Fjeldstad. 2008. Crime, Poverty and Police Corruption in Non-Rich Countries (Oslo: Norwegian Institute of International Affairs NUPI Working Paper no. 738)

Andvig, Jens Christopher & Karl Ove Moene. 1990. How Corruption May Corrupt.  
Journal of Economic Behavior & Organization

Andvig, Jens Christopher et al. 2002. Corruption. (Oslo, NUPI).

Andvig, Jens Christopher. & Boyko Todorov. 2011. Anti-Corruption in Public Procurement (Sofia, Bulgaria: Center for the Study of Democracy).

Andvig, Jens Christopher. & Gbewopo Attila. 2010. Crime, Police Corruption and Development: Evidence from Victimization Data. (Norwegian Institute of International Affairs (NUPI) Working Paper No. 772).

Andvig, Jens Christopher. 1991. The Economics of Corruption: A Survey. Studi Economici

Andvig, Jens Christopher. 2005. A House of Straw, Sticks or Bricks? Some Notes on Corruption Empirics. NUPI Working Paper No. 678.

Andvig, Jens Christopher. 2006. Corruption and Fast Change. World Development

Andvig, Jens Christopher. 2008. Corruption and Armed Conflicts: Some Stirring Around in the Governance Soup. Economics Discussion Papers, No. 2008-3, Kiel Institute for the World Economy.

Andvig, Jens Christopher. 2010. Corruption and Conflict: Contrasting Logics of Collective Action. Comparative Social Research

Anechiarico, Frank & James B. Jacobs. 1994. Visions of Corruption Control and the Evolution of American Public Administration, Public Administration Review

Anechiarico, Frank & James B. Jacobs. 1996. The Pursuit of Absolute Integrity: How Corruption Control Makes Government Ineffective.

Anechiarico, Frank. 1999. End-Runs and Hairy Eyeballs: The Costs of Corruption Control in Market Democracies. Connecticut Journal of International Law

Anechiarico, Frank. 2006. Prosecution as Corruption Control: Paradigms of Public Integrity in Context. 52 Wayne L. Rev. 1415

Ang, Yuen Yuen & Nan Jia. 2013. Perverse Complementarity: Political Connections & the Use of Courts Among Private Firms in China. Journal of Politics (forthcoming).

Ang, Yuen Yuen. 2013. Authoritarian Restraints on Online Activism Revisited: Why 'I-Paid-A-Bribe' Worked in India but Failed in China. Comparative Politics



Ang, Yuen Yuen. 2014. Authoritarian Restraints on Online Activism Revisited: Why ‘I-Paid-A-Bribe’ Worked in India but Failed in China. *American University International Law Review*

Angeles, Luuis & Kyriakos C. Neanidis. 2015. The Persistent Effect of Colonialism on Corruption. *Economica* 82(326): 319-349.

Anik, A.R., S. Bauer & M.J. Alam. 2013. Why Farm Households Have Differences in Corruption experience? Evidence from Bangladesh. *Agricultural Economics*

Anik, Asif Reza & Siedfried Bauer. 2013. Impact of Corruption on Farm Production and Profit. *Russian Journal of Agricultural and Socio-Economic Sciences*

Anik, Asif Reza & Siegfried Bauer. 2014. Household Income and Relationships with Different Power Entities as Determinants of Corruption. *Contemporary Economics*

Anokhin, Sergey & W.A. 2014. Corruption and the Ethical Context of Country-Level Entrepreneurship. *International Journal of Entrepreneurial Venturing*

Anokhin, Sergey & William S. Schulze. 2009. Entrepreneurship, Innovation, and Corruption. 2009. *Journal of Business Venturing*

Anoruo, E. & H. Braha. 2005. Corruption and Economic Growth: The African experience. *Journal of Sustainable Development in Africa*

Ansolabehere, Stephen, Alan Gerber & James M. Snyder, Jr. 2001. “Corruption and the Growth of Campaign Spending,” in Gereald Lubenow ed., *A User’s Guide to Campaign Finance Reform* (Lanham, MD: Rowman & Littlefield)

Ansolabehere, Stephen, John de Figueiredo & James M. Snyder. 2003. Why Is There So Little Money in U.S. Politics? *Journal of Economic Perspectives*

Ansolabehere, Stephen. 2007. The Scope of Corruption: Lessons from Comparative Campaign Finance Disclosure. *Election Law Journal*

Anson, J., O. Cadot & M. Olarreaga. 2006. Tariff Evasion and Customs Corruption: does Pre-Shipment Inspection Help? *Journal of Economic Analysis & Policy*

Anthonsen, Mette, Asa Lofgren, Klas Nilsson & Joakim Westerlund. 2012. Effects of Rent Dependency on Quality of Government. *Economics of Governance*

Antoci, A. & P.L. Sacco. 1995. A Public Contracting Game with Corruption. *Journal of Economics*.

Antonikova, Nika A. 2015. Private Sector Corruption in International Trade: The Need for Heightened Reporting and a Private Right of Action in the Foreign Corrupt Practices Act. *Brigham Young University International Law & Management Review*

Apaza, Carmen R. 2009. Measuring Governance and Corruption through the Worldwide

Governance Indicators: Critiques, Responses, and Ongoing Scholarly Discussion. PS: Political Science & Politics

Apergis, Nicholas, Oguzhan C. Dincer & James E. Payne. 2010. The Relationship Between Corruption and Income Inequality in U.S. States: Evidence from a Panel Cointegration and Error Correction Model. Public Choice

Apergis, Nicholas, Oguzhan C. Dincer & James E. Payne. 2012. Live Free or Bribe: On the Causal Dynamics between Economic Freedom and Corruption in U.S. States.

European Journal of Political Economy.

Apollini, Andrea. 2013. Public Procurement and Corruption in Africa: A Literature Review. Rivista di Politica Economica 2:

Apollonio, Dorie, Bruce E. Cain & Lee Drutman. 2008. Access and Lobbying: Looking Beyond the Corruption Paradigm. Hastings Constitutional Law Quarterly

Appiah, Seth Christopher Yaw, Kingdom Ametepe & Jonathan Mensah Dapaah. 2014.

Systemic Barriers to the Fight against Corruption by Anti-Corruption Institutions in Ghana. Journal of Emerging Trends in Economics & Management Sciences

Arafa, Mohamed A. 2011. Battling Corruption within a Corporate Social Responsibility Strategy. Indiana International & Comparative Law Review

Arafa, Mohamed A. 2014. "Corporate Social Responsibility and the Fight Against Corruption: Towards the Concept of CSR in Egypt after the January Revolution" in Corporate Social Responsibility in Comparative Perspective (Council on International Law & Politics)

Arbogast, S.V. 2007. Revisiting Corporate Corruption: Lessons in Practical Ethics from the Enron Wreckage. New York: Scrivener.

Arendt, F. & F. Marquart. 2015. Corrupt Politicians? Media Priming Effects on Overtly expressed Stereotypes Toward Politicians. Communications

Arezki, R. & F. van der Ploeg. 2008. Can the Natural Resource Curse Be Turned Into a Blessing? The Role of Trade Policies and Institutions. IMF Working Paper 07/55.

Arezki, Rabah & Markus Brueckner. 2011. Oil Rents, Corruption, and State Stability: Evidence from Panel Data Regressions. European Economic Review.

Arezki, Rabah & Thorvaldur Gylfason. 2013. Resource Rents, Democracy, Corruption, and Conflict: Evidence from Sub-Saharan Africa. Journal of African Economies

Argandona, A. 2003. Private-to-Private Corruption. Journal of Business Ethics

Argandona, A. 2005. Corruption and Companies: The Use of Facilitating Payments.

- 1 Journal of Business Ethics 60
- 2 Argandona, A. 2006. The United Nations Convention Against Corruption and its Impact on
- 3 International Companies. University of Navarra Business School Working Paper No. 656.
- 4 Arikan, G. Guslun. 2004. Fiscal Decentralization: A Remedy for Corruption?
- 5 International Tax & Public Finance
- 6 Arin, K. Peren et al. 2011. Why Are Corrupt Countries Less Successful in Consolidating
- 7 Their Budgets? Journal of Public Economics
- 8 Ariyabuddhiphongs, V. & C. Hongladarom. 2014. Bribe Taking Acceptability and Bribe
- 9 Payment Among Thai Organizational Employees: The Mediating Effect of Reciprocity Obligation.
- 10 International Perspectives in Psychology: Research, Practice, Consultation
- 11 Arlen, Jennifer. 1994. The Potentially Perverse Effects of Corporate Criminal Liability.
- 12 Journal of Legal Studies.
- 13 Armantier, O. & A. Boly. 2014. On the Effects of Incentive Framing on Bribery: Evidence
- 14 from an experiment in Burkina Faso. Economics of Governance
- 15 Armantier, Olivier & Amadou Boly. 2008. Can Corruption Be Studied in the Lab?
- 16 Comparing a Field and a Lab experiment. CIRANO Working Papers 2008s-26.
- 17 Armantier, Olivier & Amadou Boly. 2011. A Controlled Field experiment on Corruption.
- 18 European Economic Review
- 19 Armantier, Olivier & Amadou Boly. 2013. Comparing Corruption in the Lab and in the
- 20 Field in Burkina Faso and in Canada. Economic Journal
- 21 Armon, Jeremy. 2007. Aid, Politics and Development: A Donor Perspective.
- 22 Development Policy Review
- 23 Armstrong, Robert W. 1992. An Empirical Investigation of International Marketing Ethics:
- 24 Problems Encountered by Australian Firms. J. Bus. Ethics
- 25 Arndt, Christiane & C. Oman. 2005. Uses and Abuses of Governance Indicators (OECD:
- 26 Paris).
- 27 Arnold, Jason Ross. 2012. Political Awareness, Corruption Perceptions and Democratic
- 28 Accountability in Latin America. Acta Politica
- Arnold, Peri E. 2003. "Democracy and Corruption in the 19th Century United States: Parties
- 'Spoils' and Political Participation", in Seppo Tiihonen ed., The History of Corruption in Central

1 Government (Oxford: IOS Press).

2 Arnone, Marco & Eleni Iliopulos. 2007. The Cost of Corruption: Economic, Institutional  
3 and Social Effects. Vita e Pensiero, Milano.

4 Arona, D. 1993. Conceptualising the Context and Contextualising the Concept: Corruption  
5 Reconsidered. Indian Journal of Public Administration 39: 1-19.

6 Arozamena, Leandro & Frederico Weinschelbaum. 2009. The Effect of Corruption on  
7 Bidding Behavior in First-Price Auctions. European Economic Review

8 Arriola, Leonardo R. 2011. Patronage Circulation and Party System Fragmentation in  
9 Africa. Working paper.

10 Arvin, M. & B. Lew. 2014. does Income Matter in the Happiness-Corruption Relationship?  
11 Journal of Economic Studies

12 Asare, Bossman E. 2012. Unitarism and Presidentialism: Political Institutions and  
13 Corruption in Public Management in Ghana. Journal of Public Administration & Policy Research.

14 Ashcroft, John & John Ratcliffe. 2012. The Recent and Unusual Evolution of an expanding  
15 FCPA. 2012. Notre Dame Journal of Law, Ethics & Public Policy

16 Ashe, Daniel Patrick. 2005. The Lengthening Anti-Bribery Lasso of the United States: The  
17 Recent Extraterritorial Application of the U.S. Foreign Corrupt Practices Act.

18 Fordham Law Review

19 Asher, Sam & Paul Novosad. 2014. Dirty Politics: Natural Resource Wealth and Politics in  
20 India. Working paper.

21 Ashforth, Blake E. & Vikas Anand. 2003. The Normalization of Corruption in  
22 Organizations. Research in Organizational Behavior

23 Ashkanasay, N.M., C.A. Windsor & L.K. Trevino. 2006. Bad Apples in Bad Barrels  
24 Revisited: Cognitive Moral Development, Just World Beliefs, Rewards, and Ethical Decision  
25 Making. Business Ethics Quarterly

26 Asia Foundation. 2008. The Cost of Moving Goods: Road Transportation, Regulations and  
27 Charges in Indonesia.

28 Asian African Legal Consultative Organization. 2005. Combating Corruption: A Legal  
Analysis.

Asian Development Bank & Organization for Economic Co-Operation and Development.

2006. Anti-Corruption Policies in Asia and the Pacific: Progress in Legal and Institutional  
Reform in 24 Countries (Manila: Asian Development Bank).

- 1 Asian Development Bank. 2007. Anticorruption and Integrity: Policies and Strategies.
- 2 Asiedu, E. 2006. Foreign Direct Investment in Africa: The Role of Natural Resources,  
3 Market Size, Government Policy, Institutions and Political Stability. World Economy
- 4 Asiedu, Elizabeth & James A. Freeman. 2009. The Effect of Corruption on Investment  
5 Growth: Evidence from Firms in Latin America, Sub-Saharan Africa, and Transition Economies.  
6 Review of Development Economics
- 7 Aslaksen, Silje. 2007. Corruption and Oil: Evidence from Panel Data. Working paper.
- 8 Aslund, A. 2014. Oligarchs, Corruption, and European Integration. Journal of Democracy
- 9 Asongu, Simplice A. & Jacinta Nwachukwu. 2015. A Good Turn Deserves Another:  
10 Political Stability, Corruption and Corruption-Control. Working paper.
- 11 Asongu, Simplice A. & Jellal Mohamed. 2013. On the Channels of Foreign Aid to  
12 Corruption. Economics Bulletin
- 13 Asongu, Simplice A. & Oasis Kodila-Tedika. 2013. Crime and Conflicts in Africa:  
14 Consequences of Corruption? European Economic Letters
- 15 Asongu, Simplice A. 2011. Law, Democracy and Quality of Government in Africa. Working  
16 paper.
- 17 Asongu, Simplice A. 2012. Fighting Corruption in Africa: Do Existing Corruption-Control  
18 Levels Matter? International Journal of Development Issues
- 19 Asongu, Simplice A. 2012. Fighting Corruption with Cultural Dynamics: When Legal-  
20 Origins, Religious-Influences and Existing Corruption-Control Levels Matter. Working paper.
- 21 Asongu, Simplice A. 2012. Government Quality Determinants of Stock Market Performance  
22 in African Countries. Journal of African Business.
- 23 Asongu, Simplice A. 2012. On the Effect of Foreign Aid on Corruption. Economics Bulletin
- 24 Asongu, Simplice A. 2013. Fighting Corruption when Existing Corruption-Control Levels  
25 Count: What Do Wealth-Effects Tell Us in Africa? Institutions & Economic
- 26 Asongu, Simplice A. 2014. Globalization, (Fighting) Corruption and Development: How  
27 Are These Phenomena Linearly and Nonlinearly Related in Wealth Effects? Journal of Economic  
28 Studies
- Asongu, Simplice A. 2015. Institutional Benchmarking of Foreign Aid Effectiveness in  
Africa. International Journal of Social Economics
- Asongu, Simplice. 2014. Fighting African Corruption when Existing Corruption-Control  
Levels Matter in a Dynamic Cultural Setting. International Journal of Social Economics

1 Asquer, R. 2012. Why Do Citizens of Democracies Tolerate Corruption? Preliminary  
Evidence from the World Values Survey. Working paper.

2 Asquer, Raffaele. 2014. Media Coverage of Corruption and Incumbent Renomination in  
3 Italian Parliamentary Elections. Working paper.

4 Assiotis, A. & K. Sylwester. 2014. Do the Effects of Corruption Upon Growth Differ  
5 between Democracies and Autocracies? Review of Development Economics

6 Assiotis, Andreas. 2012. Corruption and Income. Economics Bulletin

7 Asthana, Anand N. 2012. Decentralisation and Corruption Revisited: Evidence from a  
8 Natural experiment. Public Administration & Development

9 Aterido, Reyes, Mary Hallward-Driemeier & Carmen Pages. 2007. Investment Climate and  
10 Employment Growth: The Impact of Access to Finance, Corruption and Regulations Across Firms.  
Inter-American Development Bank, Research Department Publication 4559.

11 Athanas, William. 2010. When Doing Business Internationally Becomes a Crime: Assisting  
12 Clients in Understanding and Complying with the Foreign Corrupt Practices Act. Alabama Lawyer

13 Athanasouli, Daphne & Antoine Goujard. 2015. Corruption and Management Practices:  
Firm Level Evidence. Journal of Comparative Economics (forthcoming).

14 Athanasouli, Daphne, Antoine Goujard & Pantelis Sklias. 2012. Corruption and Firm  
15 Performance: Evidence from Greek Firms. International Journal of Economic Sciences & Applied  
16 Research.

17 Atkinson, Michael M. 2011. Discrepancies in Perceptions of Corruption, or Why Is Canada  
18 So Corrupt? Political Science Quarterly

19 Attila, Gbewopo. 2009. Individual Attitudes toward Anti-Corruption Policies in Sub-  
Saharan Africa: Microeconomic Evidence. Economics Bulletin

20 Attila, Gbewopo. 2011. Corruption and Quality of Public Institutions: Evidence from  
21 Generalized Method of Moment. (Unpublished working paper).

22 Attila, Gbewopo. 2011. Corruption, Taxation and Economic Growth: Theory and Evidence.  
23 (Unpublished working paper).

24 Attila, Gbewopo. 2011. How Do African Populations Perceive Corruption: Microeconomic  
Evidence from Afrobarometer Data in Twelve Countries. CERDI-CNRA, UMR 5687.

25 Attila, Joseph. 2008. Is Corruption Contagious? An Econometric Analysis. (Norwegian  
26 Institute of International Affairs (NUPI) Working Paper No. 742).

27 Attila, Joseph. 2013. Globalization and Corruption: New Evidence. Oil, Gas & Energy  
28 Quarterly

Pg 1533 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Au, Upton. 2014. Toward a Reconceived Legislative Intent Behind the Foreign Corrupt  
2 Practices Act: The Public-Safety Rationale for Prohibiting Bribery Abroad. Brooklyn Law Review
- 3 Auriol, E., T. Flochel & S. Straub. 2011. Public Procurement and Rent-Seeking: The Case of  
4 Paraguay. Working paper.
- 5 Auriol, Emmanuelle & Aymeric Blanc. 2009. Capture and Corruption in Public Utilities:  
6 The Cases of Water and Electricity in Sub-Saharan Africa. Utilities Policy
- 7 Auriol, Emmanuelle & Stephane Straub. 2011. “Privatization of Rent-Generating Industries  
8 and Corruption”, in International Handbook on the Economics of Corruption, Vol. II. (Edward  
9 Elgar Publishing).
- 10 Auriol, Emmanuelle. 2006. Corruption in Procurement and Public Purchase.  
11 International Journal of Industrial Organization
- 12 Auriol, Emmanuelle. 2014. Capture for the Rich, Extortion for the Poor. Working paper.
- 13 Ausland, Aaron & Alfonso Tolmos. 2005. Focus on Corruption: How to Secure the Aims  
14 of Decentralization in Peru by Improving Good Governance at the Regional Level.  
15 Kennedy School of Government, Harvard University.
- 16 Avelino, George, Ciro Biderman & Marcos Felipe Mendes Lopes. 2012. Measuring  
17 Corruption: What Have We Learned? Working paper.
- 18 Avery, Michael K. 2008. Whose Rights? Why States Should Set the Parameters for Federal  
19 Honest Services Mail and Wire Fraud Prosecutions. Boston College Law Review
- 20 Ayodeji, Gafar Idowu. 2015. Assessing the Strategies of the Defunct Kenya’s Anti-  
21 Corruption Commission (KACC): Lessons for the Ethics and Anti-Corruption Commission  
22 (EACC). Working paper.
- 23 Ayres, Ian. 1997. The Twin Faces of Judicial Corruption: Extortion and Bribery. Denver  
24 University Law Review
- 25 Ayres, Margaret, Jeffrey Clark, Alan Gourley & Alexandra Wrage. 2009. Anti-Corruption.  
26 International Lawyer
- 27 Ayyagari, M., A. Demircuc-Kunt & V. Maksimovic. 2014. Bribe Payments and Innovation  
28 in Developing Countries: Are Innovating Firms Disproportionately Affected?  
Journal of Financial & Quantitative Analysis
- Azam, M. & C. Emirullah. 2014. The Role of Governance in Economic Development.  
International Journal of Social Economics



1 Azfar, Omar & Peter Murrell. 2009. Identifying Reticent Respondents: Assessing the  
2 Quality of Survey Data on Corruption and Values. Economic Development & Cultural Change

3 Azfar, Omar & Tugrul Gurgur. 2008. does Corruption Affect Health Outcomes in the  
4 Philippines? Economics of Governance

5 Azfar, Omar & William Robert Nelson Jr. 2007. Transparency, Wages, and the Separation  
6 of Powers: An experimental Analysis of Corruption. Public Choice

7 Azfar, Omar, Jeffrey A. Livingston & Patrick Meagher. 2007. "Decentralization in Uganda",  
8 in P. Bardhan & D. Mukherjee eds. Decentralisation and Local Governance in Developing  
9 Countries: A Comparative Perspective (New Delhi: Oxford University Press).

10 Azfar, Omar, Young Lee & Anand Swamy. 2001. The Causes and Consequences of  
11 Corruption, Annals of the American Academy of Political and Social Science, Vol. 573,  
12 Culture and Development: International Perspectives

13 Azfar, Omar. 2005. "Corruption and the Delivery of Health and Education Services", in  
14 Bertram Spector ed. Fighting Corruption in Developing Countries: Strategies and Analysis  
15 (Bloomfield, CT: Kumarian Press)

16 Babatunde, J.O. 2014. Corruption and Public Exclusion: A Serious Challenge to Effective  
17 Public Policy on Health. International Journal of Behavioural & Healthcare Research

18 Babeiya, Edwin. 2011. Electoral Corruption and the Politics of Elections Financing in  
19 Tanzania. Journal of Politics & Law

20 Bac, Mehmet & Parimal Kanti Bag. 2006. Beneficial Collusion in Corruption Control: The  
21 Case of Nonmonetary Penalties. Journal of Development Economic

22 Bac, Mehmet. 1996. Corruption and Supervision Costs in Hierarchies. Journal of  
23 Comparative Economics

24 Bac, Mehmet. 1996. Corruption, Supervision, and the Structure of Hierarchies, Journal of  
25 Law, Economics, & Organization

26 Bac, Mehmet. 1998. The Scope, Timing, and Type of Corruption. International Review of  
27 Law & Economics 18: 101-120.

28 Bac, Mehmet. 2001. Corruption, Connections and Transparency: does a Better Screen Imply  
a Better Scene? Public Choice

Bachmann, Reinhard, Nicole Gillespie & Richard Priem. 2015. Repairing Trust in an  
Organization After Integrity Violations: The Ambivalence of Organizational Rule Adjustments.  
Organization Studies

Bacio-Terracino, Julio. 2008. Corruption as a Violation of Human Rights. International  
Council on Human Rights Policy.



1 Bacio-Terracino, Julio. 2010. Linking Corruption and Human Rights. American Society of  
2 International Law Proceedings

3 Back, Hanna & Axel Hadenius. 2008. Democracy and State Capacity: exploring a J-Shaped  
4 Relationship. Governance

5 Badinger, Harald & Elisabeth Nindl. 2014. Globalisation and Corruption, Revisited. The  
6 World Economy

7 Badun, Marijana, Vedrana Pribicevic & Milan Deskar-Skrbic. 2014. Government Size and  
8 Efficiency as Constraints to Economic Growth: Comparing Croatia with Other European Countries.  
9 Post-Communist Economies

10 Baer, Miriam Hechler. 2009. Governing Corporate Compliance. Boston College Law  
11 Review

12 Bag, Parimal Kanti. 1997. Controlling Corruption in Hierarchies. Journal of Comparative  
13 Economics

14 Bagashka, Tanya. 2014. Unpacking Corruption: The Effect of Veto Players on State Capture  
15 and Bureaucratic Corruption. Political Research Quarterly

16 Bagenholm, Andreas & Nicholas Charron. 2014. Do Politics in Europe Benefit from  
17 Politicising Corruption? West European Politics

18 Bagenholm, Andreas. 2009. Politicizing Corruption: The Electoral Impact of Anti-  
19 Corruption Discourse in Europe, 1983-2007. QoG Working Paper Series 2009: 10 (The Quality of  
20 Government Institute, University of Gothenburg)

21 Bagenholm, Andreas. 2013. The Electoral Fate and Policy Impact of “Anti-Corruption  
22 Parties” in Central and Eastern Europe. Human Affairs

23 Bagenholm, Andreas. 2013. Throwing the Rascals Out? The Electoral Effects of Corruption  
24 Allegations and Corruption Scandals in Europe, 1981-2011. Crime, Law & Social Change

25 Bagenholm, Andreas. 2014. does Politicization of Corruption Affect Voter Turnout?  
26 Working paper.

27 Bagenholm, Andreas. 2014. Standing By Your (Wo)Man? How Voter Ideology Impacts  
28 Party Loyalty in the Face of Corruption Scandals. Working paper.

Bah, E. & L. Fang. 2015. Impact of the Business Environment on Output and Productivity in  
Africa. Journal of Development Economics

Bahmani-Oskooee, M. & G.G. Goswami. 2005. The Impact of Corruption on the Black  
Market Premium. Southern Economic Journal

Bahmani-Oskooee, Mohsen & Abm Nasir. 2002. Corruption, Law and Order, Bureaucracy,

and Real Exchange Rates. Economic Development & Cultural Change

Bahn, Charles. 1975. The Psychology of Police Corruption: Socialization of the Corrupt. Police Journal

Bai, B., X. Liu & Y. Kou. 2014. Belief in a Just World Lowers Perceived Intention of Corruption: The Mediating Role of Perceived Punishment. Plos One

Bai, C.-E. & S.-J. Wei. 2001. The Quality of Bureaucracy and Capital Account Policies. World Bank Working Paper 2575.

Bai, Jie, Seema Jayachandran, Edmund J. Malesky & Benjamin Olken. 2013. does Economic Growth Reduce Corruption? Theory and Evidence from Vietnam. Working paper.

Bailard, C.S. 2009. Mobile Phone Diffusion and Corruption in Africa. Political Communication  
Bailes, R. 2006. Facilitation Payments: Culturally Acceptable or Unacceptably Corrupt? Business Ethics: A European Review

Bailey, John & Pablo Paras. 2006. Perceptions and Attitudes about Corruption and Democracy in Mexico. Mexican Studies

Bailey, John. 2006. Corruption and Democratic Governability in Latin America: Issues of Types, Arenas, Perceptions, and Linkages. Working Paper.

Bajolle, Julie. 2006. The Origins and Motivations of the Current Emphasis on Corruption: The Case of Transparency International. Working paper.

Baker, J. & S. Milne. 2015. Dirty Money States: Illicit Economies and the State in Southeast Asia. Critical Asian Studies

Baker, J. 2015. The Rhizome State: Democratizing Indonesia's Off-Budget Economy. Critical Asian Studies

Baker, Mark B. 1993. Private Codes of Corporate Conduct: Should the Fox Guard the Henhouse? U. Miami Inter-Am. L.

Baklouti, N. & Y. Boujelbene. 2015. exploring the Relationship between Democracy, Corruption and Economic Growth in MENA Countries. Acta Universitatis Danubis Oeconomica

Baksi, Soham, Pinaki Bose & Manish Pandey. 2009. The Impact of Liberalization on Bureaucratic Corruption. Journal of Economic Behavior and Organization

Balabanova, D. & M. Mckee. 2002. Understanding Informal Payments in Health Care: The Example of Bulgaria. Health Policy

Balafoutas, Loukas. 2011. Public Beliefs and Corruption in a Repeated Psychological Game. Journal of Economic Behavior & Organization

Balan, Manuel. 2011. Corruption by Denunciation: The Political Dynamics of Corruption

Scandals in Argentina and Chile. Comparative Politics

Baland, Jean-Marie & Patrick Francois. 2000. Rent-Seeking and Resource Booms. *Journal of Development Economics*

Balaniuk, Remis, Pierre Bessiere, Emmanuel Mazer & Paulo Roberto Cobbe. 2013. Corruption Risk Analysis Using Semi-Supervised Naïve Bayes Classifiers. *International Journal of Reasoning-Based Intelligent Systems*

Bandaranayake, B. 2014. Fraud and Corruption Control at Education System Level: A Case Study of the Victorian Department of Education and Early Childhood Development in Australia. *Journal of Cases in Education Leadership*

Bandiera, Oriana, Andrea Prat & Tommaso Valletti. 2009. Active and Passive Waste in Government Spending: Evidence from a Policy experiment. *American Economic Review*

Banducci, S.A. & J.A. Karp. 1994. Electoral Consequences of Scandal and Reapportionment in the 1992 Elections. *American Politics Quarterly*

Bandura, A. 1999. Moral Disengagement in the Perpetration of Inhumanities. *Personality & Social Psychology Review*

Bandura, A. 2002. Selective Moral Disengagement in the Exercise of Moral Agency. *Journal of Moral Education*

Bandyopadhyay, Subhayu & Suryadipta Roy. 2007. Corruption and Trade Protection: Evidence from Panel Data (Federal Reserve Bank of St. Louis, Working Paper 2007-022A).

Banerjee Abhijit 1997. A Theory of Misgovernance. *Quarterly Journal of Economics*

Banerjee, Abhijit & Esther Duflo. 2006. Addressing Absence. *Journal of Economic Perspectives*

Banerjee, Abhijit V. & Rohini Pande. 2012. Parochial Politics: Ethnic Preferences and Politician Corruption (working paper).

Banerjee, Abhijit, Donald Green, Jennifer Green & Rohini Pande. 2012. Can Voters Be Primed To Choose Better Legislators? experimental Evidence from Rural India. Working paper.

Banerjee, Abhijit, Donald P. Green, Jeffrey McManus & Rohini Pande. 2014. Are Poor Voters Indifferent to Whether Elected Leaders are Criminal or Corrupt? A Vignette experiment in Rural India Political Communication

Banerjee, Abhijit, Esther Duflo & Rachel Glennerster. 2008. Putting a Band-Aid on a Corpse: Incentives for Nurses in the Indian Public Health Care System. *Journal of the European Economics Association*

Banerjee, Abhijit, Rema Hanna & Sendhil Mullainathan. 2013. "Corruption" in Robert Gibbons & John Roberts eds., *Handbook of Organizational Economics* (Princeton: Princeton

University Press), pp. 1110-Banerjee, Abhijit, Rema Hanna, Jordan Kyle, Benjamin A. Olken & Sudarno Sumarto.

2015. The Power of Transparency: Information, Identification Cards and Food Subsidy Programs in Indonesia. Working paper.

Banerjee, Abhijit, Rukmini Banerji, Esther Duflo, Rachel Glennerster & Stuti Khemani. 2010. Pitfalls of Participatory Programs: Evidence from a Randomized Evaluation in Education in India. American Economic Journal: Economic Policy

Banerjee, Abhijit, Selvan Kumar, Rohini Pande & Felix Su. 2011. Do Informed Voters Make Better Choices? experimental Evidence from Urban India. Working paper.

Banerjee, Ritwik, Tushi Baul & Tanya Rosenblat. 2015. On Self Selection of the Corrupt into the Public Sector. Economics Letters

Banerjee, Ritwik. 2015. On the Interpretation of Bribery in a Laboratory Corruption Game: Moral Frames and Social Norms. experimental Economics (forthcoming).

Banfield, Edward. 1975. Corruption as a feature of government organization. Journal of Law and Economics

Bantekas, Ilias. 2006. Corruption as an International Crime and Crime Against Humanity. Journal of International Criminal Justice

Banuri, Shaheryar & Catherine C. Eckel. 2012. Nepotism in Traditionalist Societies: US versus Pakistan. Working paper.

Banuri, Shaheryar, Rachel T.A. Croson, Reuben Kline & Catherine C. Eckel. 2008.

Towards an Improved Methodology in Analyzing Corruption: Insights from Citizen Responses to Corrupt Practices Across Countries. Working Paper.

Banuri, Sheheryar & Catherine C. Eckel. 2012. Cracking Down on Bribery. Working Paper.

Banuri, Sheheryar & Catherine C. Eckel. 2012. experiments in Culture and Corruption: A Review. World Bank Policy Research Working Paper No. 6064.

Banuri, Sheheryar & Catherine C. Eckel. 2012. On the Effects of Culture on Punishment of Bribery: US v. Pakistan. Working Paper.

Banuri, Sheheryar & Philip E. Keefer. 2012. Pro-Social Behavior Where We Least expect It? The Selection and Socialization of Intrinsically-Motivated Government (Tax!) Officials. Working Paper.

Banuri, Sheheryar, Catherine C. Eckel & Rick K. Wilson. 2012. Deconstructing Nepotism. Working Paper.

Baraldi, A. Laura. 2011. Effects of Electoral Rules, Political Competition and Corruption on

the Size and Composition of Government Consumption Spending: An Italian Regional Analysis. The B.E. Journal of Economic Analysis & Policy 8(1).

Barassi, M. & Y. Zhou. 2012. The Effect of Corruption on FDI: A Parametric and Non-Parametric Analysis. European Journal of Political Economy

Barber, S., F. Bonnet & H. Bekedam. 2004. Formalizing Under-the-Table Payments to Control Out-of-Pocket Hospital expenditures in Cambodia. Health Policy & Planning

Barbier, Edward B., Richard Damania & Daniel Leonard. 2005. Corruption, Trade, and Resource Conversion. Journal of Environmental Economics & Management

Bardhan, Pranab & Dilip Mookherjee. 2000. Capture and Governance at the Local and National Levels. American Economic Review.

Bardhan, Pranab & Dilip Mookherjee. 2005. Decentralizing Antipoverty Program Delivery in Developing Countries. Journal of Public Economics

Bardhan, Pranab & Dilip Mookherjee. 2006a. "Decentralization, Corruption, and Government Accountability: An Overview," in Susan Rose-Ackerman ed. International Handbook on the Economics of Corruption. Edward Elgar Publishing

Bardhan, Pranab & Dilip Mookherjee. 2006b. Decentralisation and Accountability in Infrastructure Delivery in Developing Countries. Economic Journal

Bardhan, Pranab. 1997. Corruption and Development: A Review of the Issues. Journal of Economic Literature

Bardhan, Pranab. 2002. Decentralization of Governance and Development. Journal of Economic Perspectives

Bardhan, Pranab. 2006. The Economist's Approach to the Problem of Corruption, 34 World Development

Bardhan, Pranab. 2015. Corruption and Development Policy (Drawing Upon the Recent Indian Debate). Journal of Public Economic Theory

Barnett, K. 2015. Distributive Justice and Proprietary Remedies Over Bribes. Legal Studies

Barone, G. & S. Mocetti. 2014. Natural Disasters, Growth and Institutions: A Tale of Two Earthquakes. Journal of Urban Economics

Barone, Guglielmo & Gaia Narciso. 2015. Organized Crime and Business Subsidies: Where does the Money Go? Journal of Urban Economics.

Barr, Abigail & Danila Serra. 2009. The Effect of Externalities and Framing on Bribery in a Petty Corruption experiment. experimental Economics

Barr, Abigail & Danila Serra. 2010. Corruption and Culture: An experimental Analysis.

Journal of Public Economics

Barr, Abigail, Frederica Mugisha, Pieter Serneels & Andrew Zeitlin. 2012. Information and Collective Action in Community-Based Monitoring of Schools: Field and Lab experimental Evidence from Uganda. Working paper.

Barr, Abigail, Magnus Lindelow & Pieter Serneels. 2009. Corruption in Public Service Delivery: An experimental Analysis. Journal of Economic Behavior & Organization

Barreto, R.A. & J. Alm. 2003. Corruption, Optimal Taxation, and Growth. Public Finance Review

Barreto, Raul A. 2000. Endogenous Corruption in a Neoclassical Growth Model. European Economic Review.

Barron, R.A. 2014. Some Current Developments under the Foreign Corrupt Practices Act. Securities Regulation Law Journal

Barta, James A. & Julia Chapman. 2012. Foreign Corrupt Practices Act. American Criminal Law Review

Barth, J., C. Lin, P. Lin & F. Song. 2009. Corruption in Bank Lending to Firms: Cross-Country Micro Evidence on the Beneficial Role of Competition and Information Sharing. Journal of Financial Economics

Bartle, S., C. Chamberlain & B. Wohlberg. 2014. Foreign Corrupt Practices Act. American Criminal Law Review

Basabe-Serrano, S. 2015. Informal Institutions and Judicial Independence in Paraguay, 1954-2011. Law & Policy

Basheka, B.C. & B.C. Mubangizi. 2012. Citizen-Driven Approaches in Fighting Corruption: A Comparative Analysis of Uganda's and South Africa's Local Government Systems. Journal of Public Administration

Basheka, B.C. 2014. The Nature and Forms of Public Procurement Corruption in Uganda's Local Government Systems: Implications for Good Governance Debate. International Journal of Procurement Management

Basheka, Benon C., Pross N. Oluka & Godfrey Mugurusi. 2015. Citizen-Driven Approaches for Combating Public Procurement Corruption in Uganda's Local Government Systems: An Empirical Survey. International Journal of Logistics Systems & Management.

Basinger, Scott J. 2013. Scandals and Congressional Elections in the Post-Watergate Era. Political Research Quarterly

Bastida, Francisco & Bernadino Benito. 2007. Central Government Budget Practices and Transparency: An International Comparison. Public Administration

Pg 1541 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Basu, G. 2014. Concealment, Corruption, and Evasion: A Transaction Cost and Case Analysis of Illicit Supply Chain Activity. *Journal of Transportation Security*

Basu, Karna, Kaushik Basu & Tito Cordella. 2014. Asymmetric Punishment as an Instrument of Corruption Control. *World Bank Policy Research Working Paper 6933*.

Basu, Kaushik, Sudipto Bhattacharya & Ajit Mishra. 1992. Notes on Bribery and the Control of Corruption. *Journal of Public Economics*

Basu, Kaushik, Tamara McGavock & Boyang Zhang. 2013. When Competition Corrupts: A Theoretical Analysis of Market Structure and the Incidence of Corruption. *World Bank Policy Research Working Paper 6596*.

Basu, Kaushik. 2012. "Why, for a Certain Class of Bribes, the Act of Giving a Bribe Should Be Considered Legal", in S. Kochhar ed., *Policy-Making for Indian Planning* (Academic Foundation).

Batabyal, A. & S. Yoo. 2007. Corruption, Bribery, and Wait Times in the Public Allocation of Goods in Developing Countries. *Review of Development Economics*

Batabyal, S. & A. Chowdhury. 2015. Curbing Corruption, Financial Development and Income Inequality. *Progress in Development Studies*

Batalla, E.V.C. 2015. Treading the Straight and Righteous Path: Curbing Corruption in the Philippines. *Asian Education & Development Studies*

Batalla, Eric C. 2001. "De-Institutionalizing Corruption in the Philippines", in Antonio C. Pedro, Jr., ed., *Combating Corruption in East Asia* (Manila: Yuchengo Center, De La Salle University)

Bates, R.H., A. Greif & S. Singh. 2002. Organizing Violence. *Journal of Conflict Resolution*

Batory, Agnes. 2010. Post-Accession Malaise? EU Conditionality, Domestic Politics and Anti-Corruption Policy in Hungary. *Global Crime*

Batory, Agnes. 2012. Political Cycles and Organisational Life Cycles: Delegation to Anti-Corruption Agencies in Central Europe. *Governance*

Batory, Agnes. 2012. Why Do Anti-Corruption Laws Fail in Central Eastern Europe? A Target Compliance Perspective. *Regulation & Governance*

Batra, G., D. Kaufmann & A.H.W. Stone. 2003. Investment Climate around the World: Voices of the Firms in the World Business Environment Survey. Washington, D.C.: World Bank/IBRD.

Batzilis, Dimitris. 2014. Bribing Abroad. Working paper.

Batzilis, Dimitris. 2015. "Bribing Abroad", in Susan Rose-Ackerman & Paul Lagunes eds.,



1 Greed, Corruption, and the Modern State

2 Bauer, Monika, Nicholas Charron & Nagmeh Nasirtuosi. 2013. does Corruption Cause Aid  
3 Fatigue? International Studies Quarterly

4 Bauhr, Monika & Marcia Grimes. 2014. Indignation or Resignation: The Implications of  
5 Transparency for Societal Accountability. Governance

6 Bauhr, Monika & Naghmeh Nasiritousi. 2011. Why Pay Bribes? Collective Action and  
7 Anticorruption Efforts. QoG Working Paper

8 Bauhr, Monika & Naghmeh Nasiritousi. 2012. Resisting Transparency: Corruption,  
9 Legitimacy, and the Quality of Global Environmental Policies. Governmental Environmental  
10 Politics

11 Baumol, W, 1990. Entrepreneurship: Productive, Unproductive, and Destructive. Journal of  
12 Political Economy

13 Baxamusa, Mufaddal & Abu M. Jalal. 2014. The Effects of Corruption on Capital Structure:  
14 When does It Matter? Journal of Developing Areas

15 Baxter, Andrew T. 1982. Federal Discretion in the Prosecution of Local Political  
16 Corruption. Pepperdine Law Review

17 Bayar, G. 2011. Causes of Corruption: Dynamic Panel Analysis of Some Post-Soviet  
18 Countries and East Asian Countries. Journal of Applied Business Research

19 Bayar, G. 2014. Spurious Middlemen in Corrupt Transactions. Economics

20 Bayar, Güzin. 2005. The Role of Intermediaries in Corruption. Public Choice

21 Bayley, D. & R. Perito. 2011. Police Corruption: What Past Scandals Teach about Current  
22 Challenges (Washington, D.C.: U.S. Institute of Peace).

23 Bazerman, Max & Francesca Gino. 2012. Behavioral Ethics: Toward a Deeper  
24 Understanding of Moral Judgment and Dishonesty. Annual Review of Law & Social Science

25 Beale, Kenneth D. & Paolo Esposito. 2009. Emergent International Attitudes Towards  
26 Bribery, Corruption and Money Laundering. Arbitration

27 Beale, Sara Sun. 2000. Comparing the Scope of the Federal Government's Authority to  
28 Prosecute Federal Corruption and State and Local Corruption: Some Surprising Conclusions and a  
Proposal. Hastings Law Journal

Beaman, Lori, Esther Duflo, Rohini Pande & Petia Topalova. 2011. Political Reservation  
and Substantive Representation: Evidence from Indian Village Councils. India Policy Forum

Bean, Bruce Winfield. 2010. Hyperbole, Hypocrisy, and Hubris in the Aid-Corruption  
Dialogue. Georgetown Journal of International Law



1 Bearse, P., G. Glomm & E. Janeba. 2000. Why Poor Countries Rely Mostly On  
2 Redistribution In-Kind. Journal of Public Economics

3 Beasley, M. 2015. Dysfunctional Equivalence: Why the OECD Antibribery Convention  
4 Provides Insufficient Guidance in the Era of Multinational Corporations. George Washington  
International Law Review

5 Beaulieu, E. 2014. From Voter ID to Party ID: How Political Parties Affect Perceptions of  
6 Election Fraud in the U.S. Electoral Studies

7 Beber, Bernd & Alexandra Scacco. 2012. What the Numbers Say: A Digit-Based Test for  
8 Election Fraud Using New Data from Nigeria. Political Analysis

9 Beblavy, M. 2009. Conditions for Effective Large-Scale Anticorruption Efforts and the Role  
10 of External Actors: What does the Slovak experience Tell Us? Public Administration &  
Development

11 Beck, Adrian & Ruth Lee. 2002. Attitudes to Corruption Amongst Russian Police Officers  
12 and Trainees. Crime, Law & Social Change

13 Beck, Paul J. & Michael W. Maher. 1985. A Comparison of Bribery and Bidding in Thin  
14 Markets. Economic Letters

15 Beck, Paul J. & Michael W. Maher. 1989. Competition, Regulation and Bribery. Managerial  
& Decision Economics

16 Beck, Paul J., Michael W. Maher & Adrian E. Tschoegl. 1991. The Impact of the Foreign  
17 Corrupt Practices Act on US exports. Managerial and Decision Economics.

18 Beck, T., A. Demircuc-Kunt & V. Maksimovic. 2005. Financial and Legal Constraints to  
19 Firm Growth: does Size Matter? Journal of Finance

20 Beck, Thorsten & Luc Laeven. 2006. Institution Building and Growth in Transition  
Economies. Journal of Economic Growth

21 Becker, Gary S. & George J. Stigler. 1974. Law enforcement, malfeasance and  
22 compensation of enforcers. Journal of Legal Studies

23 Becker, Gary. 1968. Crime and Punishment: An economic approach. Journal of Political  
24 Economy

25 Becker, Sascha O., Peter H. Egger & Tobias Seidel. 2009. Common Political Culture:  
26 Evidence on Regional Corruption Contagion. European Journal of Political Economy

27 Beekman, G., E. Bulte & E. Nillesen. 2014. Corruption, Investments and Contributions to  
Public Goods: experimental Evidence from Rural Liberia. Journal of Public Economics

28 Beesley, Celeste. 2015. Globalization and Corruption in Post-Soviet Countries: Perverse

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Effects of Economic Openness. Eurasian Geography & Economics (forthcoming).

Beets, S. Douglas. 2005. Understanding the Demand-Side Issues of International Corruption. Journal of Business Ethics

Belli, P. G. Gotsadze & H. Shahriari. 2004. Out-of-Pocket and Informal Payments in Health Sector: Evidence from Georgia. Health Policy

Bello, A.O. 2014. Gift-Giving, Anti-Bribery Laws and the Nigerian Constitution: Matters Arising. Journal of African Law

Bello, A.O. 2014. United Nations and African Union Conventions on Corruption and Anti-Corruption Legislation in Nigeria: A Comparative Analysis. African Journal of International & Comparative Law

Belloni, R. & F. Strazzari. 2014. Corruption in Post-Conflict Bosnia-Herzegovina and Kosovo: A Deal Among Friends. Third World Quarterly

Bellver, Ana & Daniel Kaufmann. 2005. Transparenting Transparency: Initial Empirics and Policy Applications. MRPA Paper No. 8188.

Beltran, A. 2015. does Corruption Increase or Decrease Employment in Firms? Applied Economics Letters 1-4.

Benabou, Roland & Jean Tirole. 2004. Willpower and Personal Rules. Journal of Political Economy

Benabou, Roland & Jean Tirole. 2011. Identity, Morals, and Taboos: Beliefs as Assets. Quarterly Journal of Economics

Bendahan, S., C. Zehnder, F.P. Pralong & J. Antonakis. 2015. Leader Corruption Depends on Power and Testosterone. Leadership Quarterly

Benedetti, Mariangela. 2014. "How Multilateral Development Banks Invest Corruption in Their Funded Projects", in Jean-Bernard Auby, Emmanuel Breen & Thomas Perroud eds., Corruption and Conflicts of Interest: A Comparative Law Approach

Benito, B., M. Guillamon & F. Bastida. 2015. Determinants of Urban Political Corruption in Local Governments. Crime, Law & Social Change

Benjamin, S., R. Bhuvaneshwari, P. Rajan & Manjunatha. 2007. Bhoomi "E-Governance," or, an Anti-Politics Machine Necessary to Globalize Bangalore. Working paper.

Benk, Serkan & Birol Karakurt. 2010. Revenue Administrations and Corruption: Motivations, Opportunities and Fighting Methods. Business & Economics Research Journal

Bennedsen, Morten, Sven E. Feldmann & David Dreyer Lassen. 2009. Strong Firms Lobby, Weak Firms Bribe: A Survey-Based Analysis of the Demand for Influence and Corruption. (unpublished manuscript)

1 Bennedsen, Morten, Sven E. Feldmann & David Dreyer Lassen. 2011. Lobbying and Bribes  
2 – A Survey-Based Analysis of the Demand for Influence and Corruption. CESifo Working Paper  
3 Series No. 3496.

4 Benson, Bruce L. & John Baden. 1985. The Political Economy of Government Corruption:  
5 The Logic of Underground Government. Journal of Legal Studies

6 Benson, Bruce L. 1988. Corruption in Law Enforcement: One Consequence of the Tragedy  
7 of the Commons Arising with Public Allocation Processes. International Review of Law &  
8 Economics

9 Bentzen, Jeanet Sinding. 2012. How Bad Is Corruption? Cross-Country Evidence of the  
10 Impact of Corruption on Economic Prosperity. Review of Development Economics

11 BenYishay, A. & P. Grosjean. 2014. Initial Endowments and Economic Reform in 27 Post-  
12 Socialist Countries. Journal of Comparative Economics

13 Berenbeim, Ronald E. 2000. Company Programs for Resisting Corrupt Practices: A Global  
14 Study.

15 Berg, S.V., L. Jiang & C. Lin. 2012. Regulation and Corporate Corruption: New Evidence  
16 from the Telecom Sector. Journal of Comparative Economics

17 Berger, Paul, Erin W. Sheehy, Kenya K. Davis & Bruce E. Yannett. 2007. Is That a Bribe?  
18 International Financial Law Review

19 Bergh, Andreas, Gunther Fink & Richard Ohrvall. 2012. Public Sector Size and Corruption:  
20 Evidence from 290 Swedish Municipalities. IFN Working Paper 938.

21 Berkman, U. 1992. Bureaucracy and Bribery: a Conceptual Framework. International  
22 Journal of Public Administration

23 Berkowitz, Daniel & Wei Li. 2000. Tax Rights in Transition Economies: A Tragedy of the  
24 Commons? Journal of Public Economics

25 Berman, E.M. 2015. HRM in Development: Lessons and Frontiers. Public Administration &  
26 Development

27 Bernardi, Richard, Michael Witek & Michael Melton. 2009. A Four Country Study of the  
28 Association between Bribery and Unethical Actions. Journal of Business Ethics

Bernheim, B.D. & N. Kartik. 2014. Candidates, Character, and Corruption. American  
Economic Journal-Microeconomics

Berry, Bryan R. 2001. Donkeys, Elephants, and Barney Fife: Are Deputy Sheriffs  
Policymakers Subject to Patronage Termination? Missouri Law Review

Bertot, John C., Paul T. Jaegerd & Justin M. Grimes. 2010. Using ICTs to Create a Culture

of Transparency: E-Government and Social Media as Openness and Anti-Corruption Tools for Societies. Government Information Quarterly

Bertrand, M. & S. Mullainathan. 2001. Do People Mean What They Say? Implications for Subjective Survey Data. American Economic Review

Bertrand, Marianne, Simeon Djankov, Rema Hanna & Sendhil Mullainathan. 2007. Obtaining a Driver's License in India: An experimental Approach to Studying Corruption. Quarterly Journal of Economics

Besley, Timothy & Andrea Prat. 2006. Handcuffs for the Grabbing Hand? Media Capture and Government Accountability. American Economic Review

Besley, Timothy & Robin Burgess. 2001. Political Agency, Government Responsiveness and the Role of the Media. European Economic Review

Besley, Timothy & Robin Burgess. 2002. The Political Economy of Government Responsiveness: Theory and Evidence from India. Quarterly Journal of Economics

Besley, Timothy J. & John McLaren. 1993. Taxes and Bribery: The Role of Wage Incentives. Economic Journal

Besley, Timothy, Rohini Pande & Vijayendra Rao. 2012. Just Rewards? Local Politics and Public Resource Allocation in South India. World Bank Economic Review

Bethencourt, Carlos & Fernando Perera-Tallo. 2015. Declining Predation During Development: A Feedback Process. Economica

Beyerle, Shaazka. 2014. Curtailing Corruption: People Power for Accountability and Justice. (Boulder, CO: Lynne Rienner).

Bhagwati, Jagdish N. 1982. Directly Unproductive, Profit-Seeking (DUP) Activities. Journal of Political Economy.

Bhargava, Vinay & Emil Bolongaita. 2004. Challenging Corruption in Asia: Case Studies and a Framework for Action (Washington, D.C.: World Bank).

Bhatnagar, Subhash C. & Nupur Singh. 2010. Assessing the Impact of E-Government: A Study of Projects in India. Information Technologies & International Development

Bhatnagar, Subhash. 2013. "E-Government: A Potent Tool to Fight Corruption," in Samuel Paul ed., Fighting Corruption: The Way Forward (Bangalore, India: Public Affairs Center).

Bhattacharyya, S. & R. Hodler. 2015. Media Freedom and Democracy in the Fight Against Corruption. European Journal of Political Economy

Bhattacharyya, Sambit & Rolad Hodler. 2010. Natural Resources, Democracy and Corruption. European Economic Review

- 1 Bhaumik, Sumon Kumar & R. Dimova. 2014. Good and Bad Institutions: Is the Debate  
2 Over? Cross-Country Firm-Level Evidence from the Textile Industry. Cambridge Journal of  
3 Economics
- 4 Bhavnani, Rikhil R. 2012. Using Asset Disclosures to Study Politicians' Rents: An  
5 Application to India. Working paper.
- 6 Bhojwani, Rashna. 2012. Deterring Global Bribery: Where Public and Private Enforcement  
7 Collide. Columbia Law Review
- 8 Bhuiyan, S. 2010. E-Government in Kazakhstan: Challenges and Its Role to Development.  
9 Public Organization Review
- 10 Bialos, Jeffrey P. & Gregory Husisian. 1997. The Foreign Corrupt Practices Act: Coping  
11 with Corruption in Transitional Economies.
- 12 Bicchieri, Christina & Erte Xiao. 2009. Do the Right Thing: But Only If Others Do So.  
13 Journal of Behavioral Decision Making
- 14 Bicchieri, Christina & John Duffy. 1997. Corruption Cycles. Political Studies
- 15 Bicchieri, Cristina & Carlo Rovelli. 1995. Evolution and Revolution: The Dynamics of  
16 Corruption. Rationality & Society
- 17 Biddulph, R. 2014. Can Elite Corruption Be a Legitimate Machiavellian Tool in an Unruly  
18 World? The Case of Post-Conflict Cambodia. Third World Quarterly
- 19 Bidhya, B. 2004. Thaksin's Model of Government Reform: Prime Ministerialisation  
20 Through "A Country is my Company" Approach. Asian Journal of Political Science
- 21 Bigge, David M. & Kiera S. Gans. 2013. The Potential for Arbitrators to Refer Suspicions of  
22 Corruption to Domestic Authorities. Transnational Dispute Management
- 23 Billger, Sherrilyn M. & Rajeev K. Goel. 2009. Do Existing Corruption Levels Matter in  
24 Controlling Corruption?: Cross-Country Quantile Regression Estimates. Journal of Development  
25 Economics
- 26 Bilotkach, V. 2006. A Tax Evasion-Bribery Game: experimental Evidence from  
27 Ukraine. European Journal of Comparative Economics
- 28 Birch, S. & N. Allen. 2015. Judging Politicians: The Role of Political Attentiveness in  
Shaping How People Evaluate the Ethical Behaviour of Their Leaders. European Journal of  
Political Research
- Birch, S. 2007. Electoral Systems and the Manipulation of Elections. Comparative Political  
Studies
- Bird, Richard M., Jorge Martinez-Vazquez & Benno Torgler. 2008. Tax Effort in

1 Developing Countries and High Income Countries: The Impact of Corruption, Voice and  
2 Accountability. Economic Analysis & Policy

3 Birney, Mayling. 2014. Decentralization and Veiled Corruption under China's Rule of  
4 Mandates. World Development.

5 Bishara, Norman & David Hess. 2014. "Human Rights and a Corporation's Duty to Combat  
6 Corruption" in Robert Bird, Daniel Cahoy & Jamie Prenkert, eds. Bridging the Gap Between  
7 Business and Human Rights (forthcoming).

8 Bishara, Norman D. & Cindy A. Schipani. 2009. Strengthening the Ties that Bind:  
9 Preventing Corruption in the Executive Suite. Journal of Business Ethics

10 Bishara, Norman D. & David W. Hess. 2014. "Will an FCPA Compliance Defense Improve  
11 Compliance with the FCPA?: An exploration of the Issues" in Philip Nichols, ed. Corruption,  
12 Business Law, and Business Ethics (University of Chicago Press) (forthcoming).

13 Bishara, Norman D. 2011. Governance and Corruption Constraints in the Middle East:  
14 Overcoming the Business Ethics Glass Ceiling. American Business Law Journal

15 Bishop, Doak. 2010. Toward a More Flexible Approach to the International Legal  
16 Consequences of Corruption. ICSID Review

17 Bixby, Michael B. 2010. The Lion Awakens: The Foreign Corrupt Practices Act—1977  
18 to 2010. San Diego International Law Journal

19 Bjorkelo, Brita. 2013. Workplace Bullying after Whistleblowing: Future Research and  
20 Implications. Journal of Management Psychology

21 Bjorkman, Martina & Jakob Svensson. 2009. Power to the People: Evidence From a  
22 Randomized Field experiment on Community-Based Monitoring in Uganda, Quarterly Journal of  
23 Economics

24 Bjorkman, Martina & Jakob Svensson. 2010. When Is Community-Based Monitoring  
25 Effective? Evidence from a Randomized experiment in Primary Health in Uganda.

26 Journal of the European Economic Association

27 Bjorkman, Martina. 2006. does Money Matter for Student Performance? Evidence from a  
28 Grant Program in Uganda. IGIER Working Paper No. 326.

Bjorkman-Nyqvist, Martina, Damien de Walque & Jakob Svensson. 2013. Information Is  
Power: experimental Evidence of the Long Run Impact of Community Based Monitoring. Working  
paper.

Bjornskov, Christian & Andreas Freytag. 2010. An Offer You Can't Refuse: Murdering  
Journalists as an Enforcement Mechanism of Corrupt Deals. Working paper.

Bjornskov, Christian. 2003. Corruption and Social Capital. Working Paper 03-13, Aarhus School of Business.

Bjornskov, Christian. 2011. Combating Corruption: On the Interplay between Institutional Quality and Social Trust. *Journal of Law & Economics* 54(1): 135-159.

Bjornskov, Christian. 2012. Can Bribes Buy Protection Against International Competition? *Review of World Economics*

Bjorvatn, Kjetil & Tina Soreide. 2005. Corruption and Privatization. *European Journal of Political Economy*

Bjorvatn, Kjetil & Tina Soreide. 2014. Corruption and Competition for Resources.

*International Tax & Public Finance*

Bjorvatn, Kjetil, Gaure Torsvik & Bertil Tungodden. 2005. How Middle-Men Can Undermine Anti-Corruption Reforms. CMI Working Papers WP 2005: 1.

Bjorvatn, Kjetil, Mohammad Reza Farzanegan & Friedrich Schneider. 2012. Resource Curse and Power Balance: Evidence from Oil-Rich Countries. *World Development*

Black, B.S., R.H. Kraakman & A. Tarassova. 2000. Russian Privatization and Corporate Governance: What Went Wrong? *Stanford Law Review*

Black, Barbara. 2012. The SEC and the Foreign Corrupt Practices Act: Fighting Global Corruption Is Not Part of the SEC's Mission. *Ohio State Law Journal*

Blackburn, Keith & Gonzalo F. Forgues-Puccio. 2007. Distribution and Development in a Model of Misgovernance. *European Economic Review*

Blackburn, Keith & Gonzalo F. Forgues-Puccio. 2009. Why Is Corruption Less Harmful in Some Countries Than in Others? *Journal of Economic Behavior & Organization*

Blackburn, Keith & Gonzalo F. Forgues-Puccio. 2010. Financial Liberalization, Bureaucratic Corruption and Economic Development. *Journal of International Money and Finance*

Blackburn, Keith & Jonathan Powell. 2011. Corruption, Inflation and Growth. *Economics Letters*

Blackburn, Keith, Kyriakos C. Neanidis & M. Emranul Haque. 2008. Corruption, Seigniorage and Growth: Theory and Evidence. CESifo Working Paper 2354.

Blackburn, Keith, Niloy Bose & M. Emranul Haque. 2006. The Incidence and Persistence of Corruption in Economic Development. *Journal of Economic Dynamics and Control*

Blackburn, Keith, Niloy Bose & M. Emranul Haque. 2010. Endogenous Corruption in Economic Development. *Journal of Economic Studies*



Blackburn, Keith, Niloy Bose & M. Emranul Haque. 2011. Public expenditures, Bureaucratic Corruption and Economic Development. The Manchester School

Blackburn, Keith. & R. Sarmah. 2009. Corruption, Development and Demography. Economics of Governance

Blake, Charles H. & Christopher G. Martin. 2006. The Dynamics of Political Corruption: Re-Examining the Influence of Democracy. Democratization

Blanchard, Olivier & Andrei Shleifer. 2001. Federalism with and without Political Centralization: China versus Russia. IMF Staff Papers

Blanco, Luisa R., Jeffrey B. Nugent & Kelsey J. O'Connor. 2015. Oil Curse and Institutional Changes: Which Institutions Are Most Vulnerable to the Curse and Under What Circumstances? Contemporary Economic Policy

Bland, G. 2014. Measuring Subnational Government Corruption in the Developing World. Public Integrity

Bliss, Christopher & Rafael Di Tella. 1997. does Competition Kill Corruption? Journal of Political Economy

Bloom, Ben. 2014. Criminalizing Kleptocracy? The ICC as a Viable Tool in the Fight Against Grand Corruption. American University International Law Review

Blount, J. & S. Markel. 2012. The End of the Internal Compliance World as We Know It, Or an Enhancement of the Effectiveness of Securities Law Enforcement? Bounty Hunting Under the Dodd-Frank Act's Whistleblower Provisions. Fordham Journal of Corporate & Financial Law

Blume, L. & S. Voigt. 2011. does Organizational Design of Supreme Audit Institutions Matter? A Cross-Country Assessment. European Journal of Political Economy

Blumkin, Tomer & Mark Gradstein. 2002. Transparency Gloves for Grabbing Hands? Politics and (Mis)Governance. CEPR Discussion Paper No. 3668.

Blundo, G. & J.-P. Olivier de Sardan. 2006. "Why Should We Study Everyday Corruption and How Should We Go About It?", in G. Blundo & J.-P. Olivier de Sardan eds., Everyday Corruption and the State: Citizens and Public Officials in Africa. Zed Books.

Blundo, G. 2007. "Hidden Acts, Open Talks: How Anthropology Can 'Observe' and Describe Corruption", in M. Nuijten & G. Anders eds., Corruption and the Secret of Law: A Legal Anthropological Perspective. Ashgate.

Blundo, G. et al. 2006. Everyday corruption and the state. Translated by Susan Cox. New York: Zed Books.

Blyschak, P. 2014. Corporate Liability for Foreign Corrupt Practices under Canadian Law. McGill Law Journal



- 1 Blyschak, P. 2014. Corporate Liability for Foreign Corrupt Practices under Canadian Law. McGill Law Journal
- 2
- 3 Bobkova, N. & H. Egbert. 2013. Corruption Investigated in the Lab: A Survey of the experimental Literature. International Journal of Latest Trends in Finance & Economic Sciences
- 4
- 5 Bobonis, Gustavo J. & Luis R. Camara Fuertes. 2015. Challenging Corrupt Politicians? Audits, Electoral Selection, and Accountability in Municipal Elections. Working paper.
- 6
- 7 Bobonis, Gustavo J., Luis R. Camara Fuertes & Rainer Schwabe. 2013. Monitoring Corruptible Politicians. Working paper.
- 8
- 9 Boehm, Frederic & Juanita Olaya. 2006. Corruption in Public Contracting Auctions: The Role of Transparency in Bidding Processes. Annals of Public and Cooperative Economics
- 10
- 11 Boehm, Frederic, Juanita Olaya & J. Polanco. 2005. "Privatization and Corruption," in E.U. von Weizsacker, O. Young & M. Finger eds., Limits to Privatization: How to Avoid Too Much of a Good Thing (London: Earthscan).
- 12
- 13 Boehm, Frederic. 2008. Risks and Challenges of Corruption in Developing Countries' Infrastructure. Network Industries Quarterly
- 14
- 15 Boehm, Frederic. 2009. Anti-Corruption in Regulation – A Safeguard for Infrastructure Reforms. Journal of Competition and Regulation in Network Industries
- 16
- 17 Boehm, Frederic. 2011. "Is There an Anti-Corruption Agenda in Regulation? Insights from Colombian and Zambian Water Regulation," in Susan Rose-Ackerman & Tina Soreide eds., International Handbook on the Economics of Corruption II (Edward Elgar Publishing).
- 18
- 19 Boerner, Kira & Christa Hainz. 2009. The Political Economy of Corruption and the Role of Economic Opportunities. Economics of Transition
- 20
- 21 Boersma, Martine. 2012. Corruption: A Violation of Human Rights and a Crime under International Law? (Intersentia, School of Human Rights Research, Vol. 56).
- 22
- 23 Bohara, Alok K., Neil J. Mitchell & Carl F. Mittendorff. 2004. Compound Democracy and the Control of Corruption: A Cross-Country Investigation. Policy Studies Journal
- 24
- 25 Boles, J. 2014. Examining the Lax Treatment of Commercial Bribery in the United States: A Prescription for Reform. American Business Law Journal
- 26
- 27 Bologna, Jamie & Amanda Ross. 2015. Corrruption and Entrepreneurship: Evidence from Brazilian Municipalities. Working paper.
- 28
- Bologna, Jamie. 2014. Is the Internet an Effective Mechanism for Reducing Corruption experience? Evidence from a Cross-Section of Countries. Applied Economics Letters
- Bologna, Jamie. 2014. The Effect of Informal Employment and Corruption on Income Levels in Brazil. Working paper.

1 Bologna, Jamie. 2015. Contagious Corruption, Informal Employment, and Income:  
2 Evidence from Brazilian Municipalities. Working paper.

3 Bologna, Jamie. 2015. Corruption: The Good, the Bad, and the Uncertain. Working paper.

4 Bolongaita, Emil P. 2010. An Exception to the Rule? Why Indonesia's Anti-Corruption  
5 Commission Succeeds Where Others Don't – A Comparison with the Philippines Ombudsman.  
6 Anti-Corruption Research Centre U4, Bergen (Norway).

7 Bolongaita, Emil. 2005. Controlling Corruption in Post-Conflict Societies. Kroc Institute  
8 Occasional Paper #26.

9 Boly, Amadou. 2011. On the Incentive Effects of Monitoring: Evidence from the Lab and  
10 the Field. experimental Economics

11 Bonaglia, Federico, Jorge Braga de Macedo & Maurizio Bussolo. 2001. How Globalisation  
12 Improves Governance. OECD Working Paper No. 181.

13 Bond, Philip. 2008. Persistent Court Corruption, Economic Journal

14 Bonga, Wellington Garikai. 2014. An Empirical Investigation of the Nature of Corruption in  
15 Zimbabwe. Working paper.

16 Bonneau, Jacqueline L. 2011. Combating Foreign Bribery: Legislative Reform in the United  
17 Kingdom and Prospects for Increased Global Enforcement. Columbia Journal of Transnational Law

18 Bonnet, Celine, Pierre Dubois, David Matrimort & Stephene Straub. 2009. Empirical  
19 Evidence on Satisfaction with Privatization in Latin America: Welfare Effects and Beliefs. IDEI  
20 Working Papers 566, Institut d'Economie Industrielle (IDEI), Toulouse.

21 Bonobis, Gustavo J., Luis R. Camara-Fuertes & Rainer Schwabe. 2015. Monitoring  
22 Corruptible Politicians. Working paper.

23 Bonstead, C. 2014. Removing the FCPA Facilitation Payments Exception: Enforcement  
24 Tools for a Cleaner Business as Usual. Houston Journal of International Law

25 Booth, D. & F. Golooba-Mutebi. 2012. Developmental Patrimonialism? The Case of  
26 Rwanda. African Affairs

27 Borcan, O., M. Lindahl & A. Mitrut. 2014. The Impact of an unexpected Wage Cut on  
28 Corruption: Evidence from a "Xeroxed" Exam. Journal of Public Economics

Border, K. & J. Sobel. 1987. Samurai Accountant: A Theory of Auditing and Plunder.  
Review of Economic Studies

Borisova, E.A. 2014. An Analysis of the Mechanisms of the Social Control of Corruption in  
the Higher Education System. Russian Education & Society

Borzel, T.A. & V. Hullen. 2014. State-Building and the European Union's Fight Against Corruption in the Southern Caucasus: Why Legitimacy Matters. Governance

Borzel, Tanja A. & Yasemini Pamuk. 2011. Pathologies of Europeanization: Fighting Corruption in the Southern Caucasus. Working paper.

Borzel, Tanja A., Andreas Stahn & Yasemin Pamuk. 2010. The European Union and the Fight Against Corruption in Its Near Abroad: Can It Make a Difference? Global Crime

Boschini, Anne D., Jan Pettersson & Jesper Roine. 2007. Resource Curse or Not: A Question of Appropriability. Scandinavian Journal of Economics

Boschini, Anne D., Jan Pettersson & Jesper Roine. 2013. The Resource Curse and Its Potential Reversal. World Development

Bose, G. 2004. Bureaucratic Delays and Bribe Taking. Journal of Economic Behaviour and Organisation

Bose, Gautam & Shubhashis Gangopadhyay. 2009. Intermediation in Corruption Markets. Indian Growth & Development Review

Bose, Gautam. 2010. Aspects of Bureaucratic Corruption. Working Paper.

Bose, Niloy, Salvatore Capasso & Antu Panini Murshid. 2008. Threshold Effects of Corruption: Theory and Evidence. World Development

Bose, Pinaki & Luciana Echazu. 2007. "Corruption with Heterogeneous Enforcement Agents in the Shadow Economy," 163 Journal of Institutional and Theoretical Economics

Bose, Pinaki. 1995. Industrial Licensing, Bribery and Allocation Efficiency. Bull. Econ.Res.

Boswell, Nancy Zucker. 1996. Combating Corruption: Are International Institutions. Doing Their Job? Proceedings of the Annual Meeting (American Society of International Law)

Boswell, Nancy Zucker. 1996. Combating Corruption: Focus on Latin America. Southwestern Journal of Law & Trade in the Americas

Boswell, Nancy Zucker. 1997. An Emerging Consensus on Controlling Corruption. University of Pennsylvania Journal of International Economic Law

Boswell, Nancy Zucker. 1999. The Law, expectations, and Reality in the Marketplace: The Problems of and Responses to Corruption. Law & Pol'y Int'l Bus.

Bota-Avram, C. 2014. Good Governance and Doing Business: Evidence from a Cross-Country Survey. Transylvanian Law Review of Administrative Sciences

Botero, Sandra, Rodrigo Castro Cornejo, Laura Gamboa, Nara Pavao & David W.

Nickerson. 2015. Says Who? An experiment on Allegations of Corruption and Credibility of

Sources. Political Research Quarterly

Boucher, A.J., W.J. Burch, M. Midyette, S. Rose & J. Terry. 2007. Mapping and Fighting Corruption in War Torn States. Stimson Center Report No. 61.

Boutros, Andrew S. & T. Markus Funk. 2012. “Carbon Copy” Prosecutions: A Growing Anticorruption Phenomenon in a Shrinking World. University of Chicago Legal Forum.

Bowers, John et al. 2007. Whistleblowing: Law and Practice, Oxford: Oxford University Press.

Bowler, Shaun & Jeffrey A. Karp. 2004. Politicians, Scandals, and Trust in Government Political Behavior.

Bowles, Roger & Nuno Garoupa. 1997. Casual Police Corruption and the Economics of Crime. International Review of Law and Economics

Bowman, Cynthia Grant. 1991. “We Don’t Want Anybody Anybody Sent”: The Death of Patronage Hiring in Chicago. Northwestern University Law Review

Bowser, Donald. 2001. “Corruption, Trust, and the Danger to Democratisation in the Former Soviet Union,” in David Lovell, ed. The Transition: Essays on Post-Communism (London: Ashgate Publishers).

Boyd, Bruce M. 2005. Governmental Corruption in China: Application of the Foreign Corrupt Practices Act. Santa Clara Journal of International Law

Boylan, Richard T. & Cheryl X. Long. 2003. Measuring Public Corruption in the American States: A Survey of State House Reporters

Boylan, Scott F. 1996. Organized Crime and Corruption in Russia: Implications for U.S. and International Law. Fordham Int’l L.J.

Bracking, Sarah. 2007. “Political Development and Corruption: Why ‘Right Here, Right Now!’?”, in Sarah Bracking ed., Corruption and Development: The Anti-Corruption Campaigns (Palgrave Macmillan)

Bracking, Sarah. 2015. “Corruption and Development: The Mutable Edges of Morality in Modern Markets”, in Paul M. Heywood ed., The Routledge Handbook of Political Corruption (New York: Routledge)

Brademas, John & Fritz Heimann. 1998. Tackling International Corruption: No Longer Taboo. Foreign Affairs. 77(Sept-Oct)

Braguinsky, S. & S. Mityakov. 2015. Foreign Corporations and the Culture of Transparency: Evidence from Russian Administrative Data. Journal of Financial Economics 117(1)

Braguinsky, Serguey, Sergey Mityakov & Andrey Liscovich. 2014. Direct Estimation of Hidden Earnings: Evidence from Russian Administrative Data. Journal of Law & Economics

1 Braguinsky, Serguey. 1996. Corruption and Schumpeterian Growth in Different Economic  
2 Environments. *Contemporary Economic Policy* 14(3)

3 Braithwaite, John & Peter Drahos. 2000. *Global Business Regulation*.

4 Braithwaite, John. 1982. Enforced Self-Regulation: A New Strategy for Corporate Crime  
5 Control. *Michigan Law Review*

6 Branstetter, Jeffrey. 2005. Darleen Druyun: An Evolving Case Study of Corruption, Power,  
7 and Procurement. *Public Contract Law Journal*

8 Bratsis, P. 2014. Political Corruption in the Age of Transnational Capitalism. *Historical  
Materialism*

9 Braun, Miguel & R. Di Tella. 2004. Inflation, Inflation Variability, and Corruption.  
10 *Economics & Politics*

11 Brautigam, D. & S. Knack. 2004. Foreign Aid, Institutions and Governance in Sub-Saharan  
12 Africa. *Economic Development & Cultural Change*

13 Bray, J. 2005. "The Use of Intermediaries and Other Alternatives to Bribery", in J.G.

14 Lambsdorff, M. Taube & M. Schramm eds., *The New Institutional Economics of Corruption*  
15 (Routledge).

16 Bray, J. 2006. "Agents, Consultants and Joint-Venture Partners in International Business  
17 Transactions", in B. Errath ed., *Business Against Corruption: Case Stories and Examples* (New  
York: United Nations Global Compact Office),

18 Breen, M. & R. Gillanders. 2015. Political Trust, Corruption, and the Ratings of the IMF  
19 and the World Bank. *International Interactions*

20 Brew, P. & J. Moberg. 2006. "The Power of Joining Forces – the Case for Collective Action  
21 in Fighting Corruption", in B. Errath ed., *Business Against Corruption: Case Stories and Examples*  
(New York: United Nations Global Compact Office)

22 Brewer, Gene A., Tujin Choi & Richard M. Walker. 2007. Accountability, Corruption and  
23 Government Effectiveness in Asia: An exploration of World Bank Governance Indicators.  
*International Public Management Review*

24 Brewster, Rachel. 2014. The Domestic and International Enforcement of the O.E.C.D. Anti-  
25 Bribery Convention. *Chicago Journal of International Law*

26 Brianzoni, S., R. Coppier & E. Michetti. 2015. Multiple Equilibria in a Discrete Time  
27 Growth Model with Corruption in Public Procurement. *Quality & Quantity*

28 Bridges, Michael. 1993. Release the Gags: The Hatch Act and Current Legislative Reform—  
Another Voice for Reform. *Capital University Law Review*

1 Brief, Arthur P., R.T. Buttram & J.M. Dukerich. 2001. "Collective Corruption in the  
2 Corporate World: Toward a Process Model", in Marlene E. Turner ed., Groups at Work: Theory and  
3 Research (Mahwah, N.J.: Lawrence Erlbaum)

4 Briffault, Richard M. 2001. Nixon v. Shrink Missouri Government PAC: The Beginning of  
5 the End of the Buckley Era? Minnesota Law Review

6 Brinkerhoff, D.W. & A.A. Goldsmith. 2005. Institutional Dualism and International  
7 Development: A Revisionist Interpretation of Good Governance. Administration & Society

8 Brinkerhoff, D.W. 2010. Unpacking the Concept of Political Will to Confront Corruption.  
9 Bergen: Chr. Michelsen Institute.

10 Brinkerhoff, Derick W. 2000. Assessing Political Will for Anti-Corruption Efforts: An  
11 Analytic Framework. Public Administration & Development

12 Broadhurst, R. & P. Wang. 2014. After the Bo Xilai Trial: does Corruption Threaten China's  
13 Future? Survival

14 Broadman, Harry G. & Francesca Recanatini. 2000. Seeds of Corruption: Do Market  
15 Institutions Matter? World Bank Policy Research Working Paper No. 2368.

16 Broadman, Harry G. & Francesca Recanatini. 2001. Seeds of Corruption: Do Market  
17 Institutions Matter? MOST: Economic Policy in Transitional Economies

18 Broadman, Harry G. & Francesca Recanatini. 2002. Corruption and Policy: Back to the  
19 Roots. Journal of Policy Reform

20 Brody, R.G., J.M. Coulter & S. Lin. 1999. The Effect of National Culture on Whistle-  
21 Blowing Perceptions. Teaching Business Ethics

22 Brollo, Fernanda & Ugo Troiano. 2015. What Happnes When a Woman Wins an Election?  
23 Evidence from Close Races in Brazil. Working paper.

24 Brollo, Fernanda, Tommaso Nannicini, Roberto Perotti & Guido Tabellini. 2013. The  
25 Political Resource Curse. American Economic Review

26 Brollo, Fernanda. 2011. Why Do Voters Punish Corrupt Politicians? Evidence from the  
27 Brazilian Anti-Corruption Program. Working paper.

28 Brooks, Allen R. 2010. A Corporate Catch-22: How Deferred and Non-Prosecution  
Agreements Impede the Full Development of the Foreign Corrupt Practices Act. Journal of Law,  
Economics & Policy 7

Brooks, Arthur. 2002. does Civil Society Stop the Downward Spiral of Bad Government or  
Speed It Up? Nonprofit & Voluntary Sector Quarterly

Brophy, S. 2008. Mexico: Cartels, Corruption and Cocaine: A Profile of the Gulf Cartel.

## 1 Global Crime

2 Brown, A.J. 2006. "What Are We Trying to Measure? Reviewing the Basics of Corruption  
3 Definition," in Charles Sampford, Arthur Shacklock, Carmel Connors & Fredrik Galtung eds.,  
Measuring Corruption (Aldershot: Ashgate)

4 Brown, D.J., J.S. Earle & S. Gehlbach. 2009. Helping Hand or Grabbing Hand? State  
5 Bureaucracy and Privatization Effectiveness. American Political Science Review

6 Brown, David S., Michael Touchton & Andrew Whitford. 2011. Political Polarization as a  
7 Constraint on Corruption: A Cross-National Comparison. World Development

8 Brown, Ed & Jonathan Cloke. 2004. Neoliberal Reforms, Governance and Corruption in the  
South: Assessing the International Anti-Corruption Crusade. Antipode

9 Brown, Ed, Jonathan Cloke & Jose Luis Rocha. 2007. "Governance, Neoliberalism and  
10 Corruption in Nicaragua", in Sarah Bracking ed., Corruption and Development: The Anti-  
Corruption Campaigns (Palgrave Macmillan)

11 Brown, George D. 1997. Should Federalism Shield Corruption?—Mail Fraud, State Law  
12 and Post- Lopez Analysis. Cornell Law Review

13 Brown, George D. 1998. Stealth Statute—Corruption, the Spending Power, and the Rise of  
14 18 U.S.C. §666. Notre Dame Law Review

15 Brown, George D. 1998. The Gratuities Offense and the RICO Approach to Independent  
16 Counsel Jurisdiction. Georgetown Law Journal 86

17 Brown, George D. 1999. The Ethics Backlash and the Independent Counsel Statute. Rutgers  
18 Law Review

19 Brown, George D. 2000. Putting Watergate Behind Us—Salinas, Sun-Diamond, and Two  
Views of the Anticorruption Model. 74 Tul. L. Rev. 747

20 Brown, George D. 2003. New Federalism's Unanswered Question: Who Should Prosecute  
21 State and Local Officials for Political Corruption? 60 Wash. & Lee L. Rev. 417

22 Brown, George D. 2004. Carte Blanche: Federal Prosecution of State and Local Officials  
23 After Sabri. Catholic University Law Review

24 Brown, George. 2006. The Gratuities Debate and Campaign Reform: How Strong Is the  
Link? Wayne Law Review

25 Brown, H. Lowell. 1998. Parent-Subsidiary Liability Under the Foreign Corrupt Practices  
26 Act. Baylor Law Review

27 Brown, H. Lowell. 1999. The Extraterritorial Reach of The U.S. Government's Campaign  
28 Against International Bribery. Hastings Int'l & Comp. L. Rev.



1 Brown, H. Lowell. 2001. Extraterritorial Jurisdiction Under the 1998 Amendments to the  
2 Foreign Corrupt Practices Act: does the Government's Reach Now Exceed Its Grasp? North  
Carolina Journal of International Law & Commercial Regulation

3 Brown, J. & M. Loosemore. 2015. Behavioural Factors Influencing Corruption in the  
4 Australian Construction Industry. Engineering, Construction & Architectural Management

5 Brown, M., L.K. Trevino & D. Harrison. 2005. Ethical Leadership: A Social Learning  
6 Perspective for Construct Development and Testing. Organizational Behavior & Human Decision  
Processes

7 Brown, Rajeswary Ampalavanar. 2006. Indonesian Corporations, Cronyism, and  
8 Corruption. Modern Asian Studies

9 Bruckner, Till. 2011. Accountability in International Aid – The Case of Georgia.  
10 Unpublished PhD thesis.

11 Brueckner, Jan K. 2000. Fiscal Decentralization in Developing Countries: The Effects of  
Local Corruption and Tax Evasion. Annals of Economics & Finance

12 Bruhn, M. 2008. License to Sell: The Effect of Business Registration Reform on  
13 Entrepreneurial Activity in Mexico. World Bank Policy Research Working Paper Series 4538.

14 Brunetti, A., G. Kisunko & B. Weder. 1997. Institutional Obstacles to Doing Business:  
15 Region-by-Region Results from a Worldwide Survey of the Private Sector. World Bank PRD  
Working Paper 1759.

16 Brunetti, Aymo & Beatrice Weder. 2003. A Free Press Is Bad News for Corruption. Journal  
17 of Public Economics

18 Brunetti, Aymo, Gregory Kisunko & Beatrice Weder. 1998. Credibility of Rules and  
19 Economic Growth: Evidence from a Worldwide Survey of the Private Sector. World Bank  
Economic Review

20 Brunnscheiler, C.N. & E.H. Bulte. 2008. Linking Natural Resources to Slow Growth and  
21 More Conflict. Science

22 Brunnschweiler, Christa N. & Erwin H. Bulte. 2008. The Resource Curse Revisited and  
23 Revised: A Tale of Paradoxes and Red Herrings. Journal of Environmental Economics &  
Management

24 Brunnschweiler, Christa N. 2008. Cursing the Blessings? Natural Resource Abundance,  
25 Institutions, and Economic Growth. World Development

26 Brusco, V., M. Nazareno & Susan C. Stokes. 2004. Vote Buying in Argentina. Latin  
27 American Research Review

28 Buccirosi, Paolo & Giancarlo Spagnolo. 2006. Leniency Policies and Illegal Transactions.  
Journal of Public Economics



1 Buchner, Susanne, Andreas Freytag, Luis G. Gonzalez & Werner Guth. 2008. Bribery and  
2 Public Procurement: An experimental Study. Public Choice

3 Budak, J. & E. Rajh. 2014. Corruption as an Obstacle for Doing Business in the Western  
4 Balkans: A Business Sector Perspective. International Small Business Journal

5 Budak, J. & M. Vizek. 2015. The Corruption Mark-Up: Is Corruption Cost Incorporated in  
6 the Prices of Goods and Services in Emerging and Developed Countries? Post-Communist  
Economies

7 Budak, J. & R.K. Goel. 2004. Transition, Governance and Corruption. *Economia*

8 Budak, J. 2007. Corruption in Croatia: Perceptions Rise, Problems Remain. *Croatian  
9 Economic Survey*

10 Budhram, T. 2015. Intelligence-Led Policing: A Proactive Approach to Combating  
11 Corruption. *SA Crime Quarterly*

12 Buehler, Michael. 2008. Shari'a By-Laws in Indonesian Districts: An Indication for  
13 Changing Patterns of Power Accumulation and Political Corruption. *Southeast Asia Research*

14 Buehler, Michael. 2011. Indonesia's Law on Public Services: Changing State-Society  
15 Relations or Continuing Politics as Usual? *Bulletin of Indonesian Economic Studies*

16 Buehn, A. & F. Schneider. 2012. Corruption and the Shadow Economy: Like Oil and  
17 Vinegar, Like Water and Fire? *International Tax & Public Finance*

18 Buehn, A. & F. Schneider. 2012. Shadow Economies Around the World: Novel Insights,  
19 Accepted Knowledge, and New Estimates. *International Tax & Public Finance*

20 Bujko, Matthias, Christian Fischer, Tim Krieger & Daniel Meierrieks. 2014. How  
21 Institutions Shape Land Deals: The Role of Corruption. Working paper.

22 Bukovansky, Mlada. 2002. Corruption Is Bad: Normative Dimensions of the Anti-  
23 Corruption Movement. Working Paper 2002/5, Department of International Relations, Australian  
National University.

24 Bukovansky, Mlada. 2006. The Hollowness of Anti-Corruption Discourse, Review of  
25 International Political Economy

26 Bulkan, J. 2014. Forest Grabbing through Forest Concession Practices: The Case of Guyana.  
27 *Journal of Sustainable Forestry*

28 Bull, Martin J. & James L. Newell. 1997. New Avenues in the Study of Political Corruption.  
*Crime, Law & Social Change*

Bulte, Erwin H., Richard Damania & Robert T. Deacon. 2005. Resource Intensity,  
Institutions and Development. *World Development*

1 Buquet, Daniel & Rafael Pineiro. 2014. Corruption and Governance Improvement in  
2 Uruguay. Working paper.

3 Burger, Ethan S. & Mary Holland. 2008. Law as Politics: The Russian Procuracy and its  
4 Investigative Committee. Columbia Journal of Eastern European

5 Burger, Ethan S. & Mary S. Holland. 2006. Why the Private Sector Is Likely to Lead the  
6 Next Stage in the Global Fight Against Corruption. Fordham International Law Journal

7 Burgess, R., M. Hansen, B.A. Olken, P. Potapov & S. Sieber. 2012. The Political Economy  
8 of Deforestation in the Tropics. Quarterly Journal of Economics

9 Burguet, Roberto & Yeon-Koo Che. 2004. Competitive Procurement with Corruption.  
10 RAND Journal of Economics

11 Burke, Thomas F. 1997. The Concept of Corruption in Campaign Finance Law.  
12 Constitutional Commentary

13 Burton, R. 2005. "Improving Integrity in Public Procurement: The Role of Transparency and  
14 Accountability", in Fighting Corruption and Promoting Integrity in Public Procurement (OECD  
15 Publishing)

16 Buscaglia, Edgardo et al. 2005. Undermining the Foundations of Organized Crime and  
17 Public Sector Corruption (Hoover Institution on War, Revolution & Peace, Essays in Public Policy  
18 Series No. 114).

19 Buscaglia, Edgardo. 1997. Corruption and Judicial Reform in Latin America. Policy Studies  
20 Journal

21 Buscaglia, Edgardo. 2001. An Analysis of Judicial Corruption and Its Causes: An Objective  
22 Governing-Based Approach. International Review of Law & Economics

23 Buscaglia, Edgardo. 2011. "On Best and Not So Good Practices for Addressing High-Level  
24 Corruption Worldwide: An Empirical Assessment", in International Handbook on the Economics of  
25 Corruption, Vol. II. (Edward Elgar Publishing).

26 Bushey, A.J. 2015. Second Generation Rule of Law and Anti-Corruption Programming  
27 Abroad: Comparing Existing U.S. Government and International Best Practices. Houston Journal of  
28 International Law

Busse, H. & C. Hefeker. 2007. Political Risk, Institutions and Foreign Direct  
Investment. European Journal of Political Economy

Busse, M. & S. Groning. 2013. The Resource Curse Revisited: Governance and Natural  
Resources. Public Choice

Bussell, Jennifer. 2010. Why Get Technical? Corruption and the Politics of Public Service  
Reform in the Indian States. Comparative Political Studies

1 Bussell, Jennifer. 2011. explaining Cross-National Variation in Government Technology  
2 Adoption. *International Studies Quarterly*

3 Bussell, Jennifer. 2012. *Corruption and Reform in India: Public Services in the Digital Age*  
4 (Cambridge University Press).

5 Bussell, Jennifer. 2012. E-Governance and Corruption in the States: Can Technology Serve  
6 the Aam Aadmi? *Economic & Political Weekly*.

7 Bussell, Jennifer. 2013. explaining Corruption: Electoral Competition and Varieties of Rent-  
8 Seeking in India. Working paper.

9 Bussell, Jennifer. 2014. Varieties of Corruption: The Organization of Rent-Sharing in India.  
10 Working paper.

11 Bussell, Jennifer. 2015. "Typologies of Corruption: A Pragmatic Approach", in Susan Rose-  
12 Ackerman & Paul Lagunes eds., *Greed, Corruption, and the Modern State*

13 Bussen, T.J. 2015. Midnight in the Garden of Ne Bis in Idem: The New Urgency for an  
14 International Enforcement Mechanism. *Cardozo Journal of International & Comparative Law*

15 Butt, S. & S.A. Schutte. 2014. Assessing Judicial Performance in Indonesia: The Court for  
16 Corruption Crimes. *Crime, Law & Social Change*

17 Butt, Simon. 2009. "Unlawfulness" and Corruption Under Indonesian Law. *Bulletin of*  
18 *Indonesian Economic Studies*

19 Butt, Simon. 2009. Indonesia's Anti-Corruption Drive and the Constitutional Court.  
20 *Comparative Law Journal*.

21 Butt, Simon. 2011. Anti-Corruption Reform in Indonesia: An Obituary? *Bulletin of*  
22 *Indonesian Economic Studies*.

23 Butte, Erwin & Richard Damania. 2008. Resources for Sale: Corruption, Democracy and the  
24 Natural Resource Curse. *The B.E. Journal of Economic Analysis & Policy* 8(1).

25 Button, M., C. Lewis, D. Shepherd & G. Brooks. 2015. Fraud in Overseas Aid and the  
26 Challenge of Measurement. *Journal of Financial Crime*

27 Byington, J. & J. McGee. 2015. M&A Due Diligence: How To Uncover Corruption. *Journal*  
28 *of Corporate Accounting & Finance*

Byrne, E.F. 2014. Toward Enforceable Bans on Illicit Business: From Moral Relativism to  
Human Rights. *Journal of Business Ethics*

Byrne, Elaine, Anne-Katrin Arnold & Fumiko Nagano. 2010. Building Public Support for  
Anti-Corruption Efforts. (Washington, D.C.: World Bank).

- 1 Byun, C.C. & E.J. Hollander. 2015. explaining the Intensity of the Arab Spring. DOMES:  
2 Digest of Middle East Studies
- 3 Cabelkova, Inna & Jan Hanousek. 2004. The Power of Negative Thinking: Corruption,  
4 Perception and Willingness to Bribe in Ukraine. Applied Economics
- 5 Cabelkova, Inna. 2001. Perceptions of Corruption in Ukraine: Are They Correct? CERGE-  
6 EI Working Paper No. 176.
- 7 Cabelkova, Inna. 2009. Entry Restrictions, Corruption and Extortion in the Context of  
8 Transition. CERGE-EI Working Paper No. 172.
- 9 Cadot, Oliver. 1987. Corruption as a Gamble. Journal of Public Economic
- 10 Caeyers, Bet & Stefan Dercon. 2012. Political Connections and Social Network in Targeted  
11 Transfer Programmes: Evidence from Rural Ethiopia. Economic Development & Cultural Change
- 12 Cai, H., H. Fang & L.C. Xu. 2011. Eat, Drink, Firms, Government: An Investigation of  
13 Corruption from the Entertainment and Travel Costs of Chinese Firms. Journal of Law &  
14 Economics
- 15 Cai, Hongbin & Daniel Treisman. 2004. State Corroding Federalism. Journal of Public  
16 Economics
- 17 Cai, Hongbin & Daniel Treisman. 2005. does Competition for Capital Discipline  
18 Governments? Decentralization, Globalization, and Public Policy. American Economic Review
- 19 Caiden, Gerald & Naomi Caiden. 1977. Administrative Corruption. Public Administration  
20 Review
- 21 Caiden, Gerald E. 1988. Toward a General Theory of Official Corruption. Asian Journal of  
22 Public Administration
- 23 Caiden, Gerald E. 2004. A Cautionary Tale: Ten Major Flaws in Combating Corruption.  
24 Southwestern Journal of Law & Trade in the Americas
- 25 Caillieer, J. 2010. Citizen Trust, Political Corruption, and Voting Behavior: Connecting the  
26 Dots. Politics & Policy
- 27 Cain, Bruce E. 2014. Is “Dependence Corruption” the Solution to America’s Campaign  
28 Finance Problems? California Law Review.
- Cain, Daylian M., George Loewenstein & Don A. Moore. 2005. The Dirt on Coming Clean:  
Perverse Effects of Disclosing Conflicts of Interest. Journal of Legal Studies
- Callahan, W. 2005. Social Capital and Corruption: Vote Buying and the Politics of Reform  
in Thailand. Perspectives on Politics.
- Callahan, W.A. 2005. The Discourse of Vote Buying and Political Reform in Thailand.

Pacific Affairs

Callen, M. & J.D. Long. 2015. Institutional Corruption and Election Fraud: Evidence from a Field experiment in Afghanistan. *American Economic Review*

Callen, M., S. Gulzar, A. Hasanain & Y. Khan. 2013. The Political Economy of Public Employee Absence. Working paper.

Callister, Debra J. 1999. Corrupt and Illegal Activities in the Forest Sector: Current Understandings and Implications for the World Bank. Washington, D.C.: World Bank.

Calomiris, Charles W., Raymond Fisman & Yongxiang Wang. 2010. Profiting from Government Stakes in a Command Economy: Evidence from Chinese Asset Sales. *Journal of Financial Economics*

Camacho, Adriana & Emily Conover. 2011. Manipulation of Social Program Eligibility. *American Economic Journal: Economic Policy*

Camaj, Lindita. 2013. The Media's Role in Fighting Corruption: Media Effects on Governmental Accountability. *The International Journal of Press/Politics*

Camara-Fuertes, Luis R. & Gustavo Bonobis. 2015. Challenging Corrupt Politicians? Audits, Challengers Entry, and Electoral Accountability in Municipal Elections. Working paper.

Camerer, Marianne. 2006. Measuring Public Integrity. *Journal of Democracy*

Cameron, Lisa et al. 2009. Propensities to Engage in and Punish Corrupt Behavior: experimental Evidence from Australia, India, Indonesia and Singapore. *Journal of Public Economics*

Cammarosano, Louis. 1989. Application of the First Amendment to Political Patronage Employment Decisions. *Fordham Law Review*

Camp, E., A. Dixit & S. Stokes. 2014. Catalyst or Cause? Legislation and the Demise of Machine Politics in Britain and the United States. *Legislative Studies Quarterly*

Campante, Filipe R. & Quoc-Anh Do. 2014. Isolated Capital Cities, Accountability, and Corruption: Evidence from US States. *American Economic Review*

Campante, Filipe R., Davin Chor & Quoc-Anh Do. 2009. Instability and the Incentives for Corruption. *Economics & Politics*

Campbell, Jamie-Lee & Anja Goritz. 2014. Culture Corrupts! A Qualitative Study of Organizational Culture in Corrupt Organizations. *Journal of Business Ethics*

Campbell, Stuart Vincent. 2013. Perception Is Not Reality: The FCPA, Brazil, and the Mismeasurement of Corruption. *Minnesota Journal of International Law*

Campos, J. Edgardo, Donald Lien & Sanjay Pradhan. 1999. The Impact of Corruption on

Investment: Predictability Matters. World Development

Campos, J.E. & V. Bhargava. 2007. "Introduction: Tackling a Social Pandemic", in J.E.

Campos & S. Pradhan eds., The Many Faces of Corruption: Tracking Vulnerabilities at the Sector Level (Washington, D.C.: World Bank).

Campos, J.E., S. Pradhan & F. Recanatini. 2007. "Conclusion: Where to Next", in J.E.

Campos & S. Pradhan eds., The Many Faces of Corruption: Tracking Vulnerabilities at the Sector Level (Washington, D.C.: World Bank).

Campos, Jose Edgardo & Joel S. Hellman. 2005. "Governance Gone Local: does Decentralization Improve Accountability?", in Roland White & Paul Smoke eds., East Asia Decentralizes: Making Local Government Work in Asia (Washington, D.C.: World Bank)

Campos, Nauro F. & Francesco Giovannoni. 2007. Lobbying, Corruption and Political Influence. Public Choice

Campos, Nauro F., Ralitza Dimova & Ahmad Saleh. 2010. Whither Corruption? A Quantitative Survey of the Literature on Corruption and Growth. IZA Discussion Paper No. 5334.

Cantu, F. & O. Garcia-Ponce. 2015. Partisan Losers' Effects: Perceptions of Electoral Integrity in Mexico. Electoral Studies

Cantu, F. 2014. Identifying Irregularities in Mexican Local Elections. American Journal of Political Science.

Cantu, Francisco & Sebastian M. Singh. 2011. Fraudulent Democracy? An Analysis of Argentina's Infamous Decade Using Supervised Machine Learning. Political Analysis

Carbonara, Emanuela. 2000. Corruption and Decentralisation. Working paper.

Carden, Art & Lisa L. Verdon. 2010. When Is Corruption a Substitute for Economic Freedom? Law & Development Review

Carey, John M. & Matthew Soberg Shugart. 1995. Incentives to Cultivate a Personal Vote: A Rank Ordering of Electoral Formulas. Electoral Studies

Carlberg, Christopher K. 2003. A Truly Level Playing Field for International Business: Improving the OECD Convention on Combating Bribery Using Clear Standards. Boston College International & Comparative Law Review

Carlin, R.E., G.J. Love & C. Martinez Gallardo. 2015. Cushioning the Fall: Scandals, Economic Conditions, and Executive Approval. Political Behavior

Carothers, Thomas. 2007. A Quarter-Century of Promoting Democracy. Journal of Democracy

- 1 Carpenter, S. 2015. Avoid an Investigation: Automate FCPA Compliance. Criminal Justice
- 2 Carr, Indira & David Lewis. 2010. Combating Corruption through Employment Law and
- 3 Whistleblower Protection. Industrial Law Journal
- 4 Carr, Indira & Miriam Goldby. 2011. Recovering the Proceeds of Corruption: UNCAC and
- 5 Anti-Money Laundering Standards. Journal of Business Law
- 6 Carr, Indira & Opi Outhwaite. 2008. The OECD Anti-Bribery Convention Ten Years On.
- 7 Manchester Journal of International Economic Law
- 8 Carr, Indira & Opi Outhwaite. 2009. Corruption and Business Integrity: Law, Policy and
- 9 Company Practices. Manchester Journal of International Economic Law
- 10 Carr, Indira & Opi Outhwaite. 2011. The Role of Non-Governmental Organizations (NGOs)
- 11 in Combating Corruption: Theory and Practice. Suffolk University Law Review
- 12 Carr, Indira & Robert Jago. 2014. Petty Corruption, Development and Information
- 13 Technology as an Antidote. Round Table
- 14 Carr, Indira. 2006. The United Nations Convention on Corruption: Improving the Quality of
- 15 Life of Millions in the World? Manchester Journal of International Economic Law
- 16 Carr, Indira. 2007. Corruption in Africa: Is the African Union Convention on Combating
- 17 Corruption the Answer? Journal of Business Law 2007
- 18 Carr, Indira. 2009. Corruption, the Southern African Development Community Anti-
- 19 Corruption Protocol and the Principal-Agent-Client Model. International Journal of Law in Context
- 20 Carrillo, Juan D. 2000. Corruption in Hierarchies. Annales d'Economie et de Statistique
- 21 Carrillo, Juan D. 2000. Grafts, Bribes and the Practice of Corruption. Journal of Economics
- 22 & Management Strategy.
- 23 Carrington, Paul D. 2010. Enforcing International Corrupt Practices Law. Michigan Journal
- 24 of International Law
- 25 Carrington, Paul D. 2010. The International Movement to Deter Corruption: Should China
- 26 Join? US-China Law Review
- 27 Carrington, Paul D. 2012. Qui Tam: Is False Claims Law a Model for International Law?
- 28 University of Chicago Legal Forum.
- Carrington, Paul D. 2013. "Private Enforcement of International Law", in Susan Rose-
- Ackerman & Paul D. Carrington eds., Anti-Corruption Policy: Can International Actors Play a
- Constructive Role? (Durham: Carolina Academic Press),.
- Carrington, Paul. 2007. Law and Transnational Corruption: The Need for Lincoln's Law
- Abroad. Law & Contemporary Problems



- 1 Carson, L.D. 2014. Deterring Corruption: Beyond Rational Choice Theory. Working paper.
- 2 Carson, Lindsey D. & Mariana Mota Prado. 2014. Mapping Corruption and its Institutional
- 3 Determinants in Brazil. IRIBA Working Paper #8.
- 4 Carter, C.R. 2000. Precursors of Unethical Behavior in Global Supplier Management.
- 5 Journal of Supply Chain Management
- 6 Cartier-Bresson, Jean. 1997. Corruption Networks, Transaction Security and Illegal Social
- 7 Exchange. Political Studies
- 8 Carvajal, Raul. 1999. Large-Scale Corruption: Definition, Causes, and Cures. Systemic
- 9 Practice & Action Research
- 10 Caseley, Jonathan. 2004. Public Sector Reform and Corruption: CARD Façade in Andhra
- 11 Pradesh. Economic & Political Weekly .
- 12 Caselli, Francesco & Guy Michaels. 2013. Do Oil Windfalls Improve Living Standards?
- 13 Evidence from Brazil. American Economic Journal: Applied Economics
- 14 Caselli, Francesco & Massimo Morelli. 2004. Bad Politicians. Journal of Public Economics
- 15 Caselli, Francesco & Tom Cunningham. 2009. Leader Behavior and the Natural Resource
- 16 Curse. Oxford Economic Papers
- 17 Caspary, G. 2012. Practical Steps To Help Countries Overcome the Resource Curse: The
- 18 Extractive Industries Transparency Initiative. Global Governance
- 19 Cassin, S. 2014. The Best Offense is a Good Defense: How the Adoption of an FCPA
- 20 Compliance Defense Could Decrease Foreign Bribery. Houston Journal of International Law
- 21 Castillo, Marco, Ragan Petrie, Maximo Torero & Angelino Viceisza. 2014. Lost in the Mail:
- 22 A Field experiment on Crime. Economic Inquiry
- 23 Castro, M., C. Guccio & I. Rizzo. 2014. An Assessment of the Waste Effects of Corruption
- 24 on Infrastructure Provision. International Tax & Public Finance
- 25 Castro, Massimo Finocchiaro, Calogero Guccio & Ilde Rizzo. 2014. An Assessment of the
- 26 Waste Effects of Corruption on Infrastructure Provision. International Tax & Public Finance
- 27 Castro, Massimo Frinocchiaro. 2011. To Bribe or Not to Bribe: An experimental Analysis of
- 28 Corruption. DSSGES Working Paper.
- Catterburg, Gabriela & Alejandro Moreno. 2005. The Individual Bases of Political Trust:
- Trends in New and Established Democracies. International Journal of Public Opinion Research
- Caulkins, Jonathan et al. 2014. A Dynamic Analysis of Schelling's Binary Corruption
- Model: A Competitive Equilibrium Approach. Journla of Optimization Theory & Applications



1 Cava, Anita. 2011. Quid Pro Quo is “So Yesterday”: Restoring Honest Services Fraud After  
2 Skilling and Black. U.C. Davis Business Law Journal

3 Cavanagh, C. 2012. Unready for REDD+? Lessons from Corruption in Ugandan  
4 Conservation Areas. Bergen: CMI.

5 Cavill, S. & M. Sohail. 2007. Accountability Arrangements to Combat Corruption:  
6 Literature Review. Water, Engineering and Development Centre, Londonborough University.

7 Cavoli, T. & J.K. Wilson. 2015. Corruption, Central Bank (In)dependence and Optimal  
8 Monetary Policy in a Simple Model. Journal of Policy Modeling

9 Celarier, Michelle. 1997. Privatization: A Case Study in Corruption. Journal of International  
10 Affairs

11 Celentani, Marco & Juan-Jose Ganuza. 1999. Corruption and the Hadleyburg Effect.  
12 Working Paper.

13 Celentani, Marco & Juan-Jose Ganuza. 2002 Corruption and Competition and Procurement.  
14 European Economic Review

15 Celentani, Marco & Juan-Jose Ganuza. 2002. Organized vs. Competitive Corruption.  
16 Annals of Operations Research

17 Celentani, Marco, Juan-Jose Ganunza & Thierry Verdier. 2005. Corruption and Competition  
18 in Procurement Auctions. Rand Journal of Economics

19 Celentani, Marcos, Juan Jose Ganuza & Jose Luis Peydro. 2004. Combating Corruption in  
20 International Business Transactions. Economica

21 Cerqueti, R. & R. Coppier. 2009. Tax Revenues, Fiscal Corruption and “Shame” Costs.  
22 Economic Modelling

23 Cerqueti, R. & R. Coppier. 2015. Corruptibility and Tax Evasion. European Journal of Law  
24 & Economics

25 Cerqueti, R., R. Cooper & G. Piga. 2012. Corruption, Growth and Ethnic Fractionalization:  
26 A Theoretical Model. Journal of Economics

27 Chadda, M. 2004. “India: Between Majesty and Modernity”, in R.A. Johnson ed., The  
28 Struggle Against Corruption (New York: Palgrave Macmillan)

Chadhuri, S. & K. Dastidar. 2014. Corruption, Efficiency Wage and Union Leadership.  
Pacific Economic Review

Chaffee, Eric C. 2012. The Role of the Foreign Corrupt Practices Act and Other  
Transnational Anti-Corruption Laws in Preventing or Lessening Future Financial Crises. Ohio State

Law Journal

Chafuen, Alejandro A. & Eugenio Guzman. 2000. "Economic Freedom and Corruption", in Gerald P. O'Driscoll, Jr., Kim R. Holmes & Melanie Kirkpatrick eds., 2000 Index of Economic Freedom (Heritage Foundation)

Chaikin, David & Jason C. Sharman. 2009. Corruption and Money Laundering: A Symbiotic Relationship.

Chaikin, David. 2005. Policy and Legal Obstacles in Recovering Dictators' Plunder. Bond Law Review

Chaikin, David. 2008. Commercial Corruption and Money Laundering: A Preliminary Analysis. Journal of Financial Crime

Chaikin, David. 2012. "Corrupt Practices Involving Offshore Financial Centers", in Adam Graycar & Russell G. Smith eds., Handbook of Global Research and Practice in Corruption ,

Chalaby, Jean K. 2004. Scandal and the Rise of Investigative Reporting in France. American Behavioral Scientist

Chalmers, I. & B. Setiyono. 2012. The Struggle Against Corruption During the Democratic Transition: Theorising the Emerging Role of CSOs. Development & Society

Chan, Hon S. & Jie Gao. 2009. "Preventing Corruption Through Performance Measurement: The Case of China", in Gong, T. & S.K. Ma eds., Preventing Corruption in Asia: Institutional Design and Policy Capacity (London: Routledge),

Chand, Sheetal K. & Karl O. Moene. 1997. Controlling Fiscal Corruption. World Development

Chanda, Parthapratim. 2004. The Effectiveness of the World Bank's Anti-Corruption Efforts: Current Legal and Structural Obstacles and Uncertainties. Denver Journal of International Law & Policy.

Chander, Parkash & Louis Wilde. 1992. Corruption in Tax Administration. Journal of Public Economic

Chandler, J. & J. Graham. 2010. Relationship-Oriented Cultures, Corruption, and International Marketing Success. Journal of Business Ethics

Chang, Eric & Miriam A. Golden. 2010. Sources of Corruption in Authoritarian Regimes. Social Science Quarterly

Chang, Eric C.C. 2005. Electoral Incentives for Political Corruption under Open-List Proportional Representation. Journal of Politics

Chang, Eric C.C. & Miriam A. Golden. 2007. Electoral Systems, District Magnitude and

Corruption. British Journal of Political Science

Chang, Eric C.C. & Yun-han Chu. 2006. Corruption and Trust: Exceptionalism in Asian Democracies? Journal of Politics

Chang, Eric C.C., Miriam A. Golden & Seth J. Hill. 2010. Legislative Malfeasance and Political Accountability. World Politics

Chang, Juin-Jen, C.C. Lai & C. C. Yang. 2000. Casual Police Corruption and the Economics of Crime: Further Results. International Review of Law & Economics

52. Chang, Juin-Jen, Huei-Chung Lu & Hsueh-Fang Tsai. 2015. Corruption, Growth, and Increasing Returns to Production Specialization. International Journal of Economic Theory

Chang, S. 2015. The Effects of Trade Liberalization on Environmental Degradation. Quality & Quantity

Chanley, V.J., L. Sullivan, M.H. Gonzales & M.B. Kovera. 1994. Lust and Avarice in Politics: Damage Control by Four Politicians Accused of Wrongdoing (or, Politics as Usual). American Politics Quarterly

Charap, Joshua & Christian Harm. 1999. Institutionalized Corruption and the Kleptocratic State. IMF Working Paper No. 99/91.

Charap, Joshua & Christian Harm. 2000. "Institutionalized Corruption and the Kleptocratic State," in Claude Menard, ed. Institutions, Contracts, and Organizations: Perspectives from New Institutional Economics (Cheltenham, UK: Edward Elgar).

Charkoff, A., K.A. Thomas, O.S. Hague & L. Young. 2015. An Indecent Proposal: The Dual Functions of Indirect Speech. Cognitive Science

Charkraborty, Shankha & Era Dabla-Norris. 2009. The Quality of Public Investment. IMF Working Paper No. 09/154.

Charles, Guy-Uriel E. 2014. Corruption Temptation. California Law Review

Charlton, Roger. 1990. exploring the Byways of African Political Corruption: Botswana and Deviant Case Analysis. Corruption & Reform

Charoensukmongol, Peerayuth & Murad Moqbel. 2014. does Investment in ICT Curb or Create More Corruption? A Cross-Country Analysis. Public Organization Review

Charron, Nicholas & Victor Lapuente. 2010. does Democracy Produce Quality of Government? European Journal of Political Research

Charron, Nicholas & Victor Lapuente. 2011. Which Dictators Produce Quality of Government? Studies in Comparative Political Development

Charron, Nicholas et al. 2010. Measuring the Quality of Government and Subnational

Variation. Report for the European Comissin Directorate-General Regional Policy Directorate.

Charron, Nicholas, L. Dijkstra & V. Lapuente. 2014. Regional Governance Matters: Quality of Government with European Union Member States. Regional Studies

Charron, Nicholas, L. Dijkstra & V. Lapuente. 2015. Mapping the Regional Divide in Europe: A Measure for Assessing Quality of Government in 206 European Regions. Social Indicators Research

Charron, Nicholas, Victor Lapuente & Bo Rothstein eds. 2013. Quality of Government and Corruption From a European Perspective: A Comparative Study of Good Government in EU Regions (Edward Elgar Publishing).

Charron, Nicholas. 2009. Government Quality and Vertical Power-Sharing in Fractionalized States. Publius: The Journal of Federalism

Charron, Nicholas. 2009. The Impact of Socio-Political Integration and Press Freedom on Corruption. Journal of Development Studies

Charron, Nicholas. 2010. The Correlates of Corruption in India: Analysis and Evidence from the States. Asian Journal of Political Science

Charron, Nicholas. 2011. exploring the Impact of Foreign Aid on Corruption – Has the ‘Anti-Corruption’ Movement Been Effective? The Developing Economies

Charron, Nicholas. 2011. Party System, Electoral Systems and Constraints on Corruption. Electoral Studies

Charron, Nicholas. 2013. How Much Are Corruption Perceptions explained by Actual experience with Corruption? Working paper.

Charron, Nicholas. 2015. Do Corruption Measures Have a Perception Problem?

Assessing the Relationship Between experiences and Perceptions of Corruption Among Citizens and experts. European Political Science Review (forthcoming).

Charumilind, C., R. Kali & Y. Wiwattanakantang. 2006. Connected Lending: Thailand before the Financial Crisis. Journal of Business

Chassang, Sylvain & Gerard Padro I Miquel. 2014. Corruption, Intimidation, and Whistle-Blowing: A Theory of Inference from Unverifiable Reports. Working paper.

Chatterjee, Ishita & Ranjan Ray. 2012. does the Evidence on Corruption Depend on How It Is Measured? Results from a Cross-Country Study on Microdata Sets. Applied Economics.

Chatterjee, Shinjini. 2015. Dangerous Liaisons: Criminalization of “Relationship Hires” Under the Foreign Corrupt Practices Act. University of Pennsylvania Law Review

Chaudhury, Nazmul, Jeffrey Hammer, Michael Kremer, Karthik Muralindharan & F. Halsey

1 Rogers. 2006. Missing in Action: Teacher and Health Worker Absence in Developing Countries.  
Journal of Economic Perspectives

2 Chayes, I., L. Fergusson & J.A. Robinson. 2015. He Who Counts Elects: Economic Elites,  
3 Political Elites, and Electoral Fraud. Economics & Politics

4 Chayes, Sarah. 2015. Thieves of State: Why Corruption Threatens Global Security (New  
5 York: W.W. Norton & Co.).

6 Che, Yeon-Koo. 1995. Revolving Doors and Optimal Tolerance for Agency Collusion.  
RAND Journal of Economics.

7  
8 Chen, C.W., J. Cullen & K. Parboteeah. 2015. Are Manager-Controlled Firms More Likely  
9 to Bribe than Shareholder-Controlled Firms: A Cross-Cultural Analysis. Management &  
Organization Review

10 Chen, Christine S. & Dominik Zaum. 2008. Introduction – Key Themes in Peacebuilding  
and Corruption. International Peacekeeping

11  
12 Chen, K. 2000. Towards an Integrated Model of Corruption: Opportunities and Control in  
China. International Journal of Public Administration

13 Chen, Kang, Arye L. Hillman & Qingyang Gu. 2002. “From the Helping Hand to the  
14 Grabbing Hand: Fiscal Federalism and Corruption in China,” in J. Wong & D. Lu eds., China’s  
Economy in the New Century: Structural Issues and Problems (New Jersey: World Scientific).

15  
16 Chen, Kang. 2004. Fiscal Centralization and the Form of Corruption in China. European  
Journal of Political Economy

17  
18 Chen, M., B.N. Jeon, R. Wang & J. Wu. 2015. Corruption and Bank Risk-Taking: Evidence  
from Emerging Economies. Emerging Markets Review

19 Cheng, Jinhua. 2009. Police Corruption Control in Hong Kong and New York City: A  
20 Dilemma of Checks and Balances in Combating Corruption. BYU Journal of Public Law

21 Chereches, R.M., M.I. Ungureanu, P. Sandu & I.A. Rus. 2013. Defining Informal Payments  
in Healthcare: A Systematic Review. Health Policy

22  
23 Chetwynd, E., F. Chetwynd & B. Spector. 2003. Corruption and Poverty: A Review of  
Recent Literature. (London: Management Systems International).

24 Cheung, Steven N.S. 1996. A Simplistic General Equilibrium Theory of Corruption.  
25 Contemporary Economic Policy

26 Cheung, Yan Leung, P. Raghavendra Rau & Aris Stouraitis. 2012. How Much Do Firms Pay  
as Bribes and What Benefits Do They Get? Evidence from Corruption Cases Worldwide. NBER  
27 Working Paper No. 17981.

28 Chimezule, Obinuchi. 2015. Strengthening Institutions in the Fight Against Corruption and

1 Financial Crimes in Nigeria. Working paper.

2 Chiru, Mihail & Sergiu Gherghina. 2012. When Voter Loyalty Fails: Party Performance and  
3 Corruption in Bulgaria and Romania. *European Political Science Review*

4 Chiti, Edoardo. 2014. "Mismanagement by European Agencies: Concerns, Institutional  
5 Responses, and Lessons", in Jean-Bernard Auby, Emmanuel Breen & Thomas Perroud eds.,  
6 *Corruption and Conflicts of Interest: A Comparative Law Approach*

7 Cho, Wendy K. Tam & Brian J. Gaines. 2007. Breaking the (Benford) Law: Statistical Fraud  
8 Detection in Campaign Finance. *IEEE Intelligent Systems*

9 Cho, Wonbin & Matthew F. Kirwin. 2008. A Vicious Circle of Corruption and Mistrust in  
10 Institutions in Sub-Saharan Africa: A Micro-Level Analysis. (Working Paper No. 71,  
11 Afrobarometer, Cape Town.)

12 Cho, Y.H. & B.-D. Choi. 2004. E-Government to Combat Corruption: The Case of Seoul  
13 Metropolitan Government. *International Journal of Public Administration*

14 Choe, Chongwoo, Ratbek Dzhumashev, Asadul Islam & Zakir H. Khan. 2013. The Effect of  
15 Informal Networks on Corruption in Education: Evidence from the Household Survey Data in  
16 Bangladesh. *Journal of Development Studies*

17 Choi, E.J. & J.S. Woo. 2012. Political Corruption, Economy, and Citizens' Evaluation of  
18 Democracy in South Korea. *Contemporary Politics*

19 Choi, Eunjung & Jongseok Woo. 2010. Political Corruption, Economic Performance, and  
20 Electoral Outcomes: A Cross-National Analysis. *Contemporary Politics*

21 Choi, J.W. 2009. Institutional Structures and Effectiveness of Anticorruption Agencies: A  
22 Comparative Analysis of South Korea and Hong Kong. *Asian Journal of Political Science*

23 Choi, Jay Pil & Marcel Thum. 2003. The Dynamics of Corruption with the Ratchet Effect.  
24 *Journal of Public Economics*

25 Choi, Jay Pil & Marcel Thum. 2004. The Economics of Repeated Extortion. *Rand Journal of  
26 Economics*

27 Choi, Jay Pil & Marcel Thum. 2005. Corruption and the Shadow Economy. *International  
28 Economic Review*

Choi, Jin-Wook. 2007. Governance, Structure, and Administrative Corruption in Japan: An  
Organizational Network Approach. *Public Administration Review*

Choi, Stephen J. & Keven E. Davis. 2014. Foreign Affairs and Enforcement of the Foreign  
Corrupt Practices Act. *Journal of Empirical Legal Studies*

Chomski, Cara. 2012. Campbell's Soup: Due Process Concerns in Applying the Federal  
Anti-Bribery Statute to Noncitizen Government Contractors Overseas. *University of Chicago Legal*

Forum 2012

Chong, Alberto & Cesar Calderon. 2000. Institutional Quality and Income Distribution. Economic Development & Cultural Change

Chong, Alberto & Cesar Calderon. 2000. Institutional Quality and Poverty Measures in a Cross-Section of Countries. Economics of Governance

Chong, Alberto & Mark Gradstein. 2007. Inequality and Institutions. Review of Economics & Statistics

Chong, Alberto, Ana L. De La O, Dean Karlan & Leonard Wantchekon. 2015. does Corruption Information Inspire the Fight or Quash the Hope? A Field experiment in Mexico on Voter Turnout, Choice, and Party Identification. Journal of Politics

Chou, W. 2014. Restoring Integrity in American Business: A Broad Interpretation of the Foreign Corrupt Practices Act. Wayne Law Review

Chow, D.C.K. 2014. Three Major Risks under the Foreign Corrupt Practices Act for U.S. Multinational Companies Doing Business in China. Fordham International Law Journal

Chow, Daniel C.K. 2014. Why China's Crackdown on Commercial Bribery Threatens Multinational Companies in China. Arizona Journal of International and Comparative Law (forthcoming).

Chow, Daniel. 2012. China Under the Foreign Corrupt Practices Act. Wisconsin Law Review 2012

Chow, Daniel. 2012. The Interplay Between China's Anti-Bribery Laws and the Foreign Corrupt Practices Act. Ohio State Law Journal

Chowdhury, Shyamal K. 2004. The Effect of Democracy and Press Freedom on Corruption: An Empirical Test. Economics Letters

Christensen, J. 2012. The Hidden Trillions: Secrecy, Corruption, and the Offshore Interface. Crime, Law & Social Change

Christensen, R. & T.J. Schultz. 2014. Identifying Election Fraud Using Orphan and Low Propensity Voters. American Politics Research

Christensen, Zachary, Dustin Homer & Daniel Nielson. 2011. Dodging Adverse Selection: How Donor Type and Governance Condition Aid's Effects on School Enrollment. World Development

Christensen, Zachary, Richard Nielsen, Daniel Nielsen & Michael Tierney. 2011. Transparency Squared: The Effects of Aid Transparency on Recipients' Corruption Levels. Working paper.

Chu, C.Y. Cyrus. 1990. Income Tax Evasion with Venal Tax Officials – The Case of



1 Developing Countries. Public Finance

2 Chua, Yvonne T. 1999. Robbed: An Investigation of Corruption in Philippine Education  
(Quezon City: Philippine Center for Investigative Journalism).

3 Cingano, Federico & Paolo Pinotti. 2013. Politicians at Work: The Private Returns and  
4 Social Costs of Political Connections. Journal of the European Economic Association

5 Ciocchini, F., E. Durbin & D. Ng. 2003. does Corruption Increase Emerging Market Bond  
6 Spreads? Journal of Economics & Business

7 Cisar, Ondrej. 2003. Strategies for Using Information Technology for Curbing Public Sector  
8 Corruption: The Case of the Czech Republic (CR). Open Society Institute, Budapest.

9 Claessens, S. et al. 2008. Political Connections and Preferential Access to Finance: The Role  
10 of Campaign Contributions. Journal of Financial Economics

11 Clare Cohen, J. 2002. Improving Transparency in Pharmaceutical Systems: Strengthening  
Critical Points against Corruption (Latin American and Caribbean Bank).

12 Clark, D. 1987. A Community Relations Approach to Corruption: The Case of Hong Kong.  
13 Corruption and Reform

14 Clark, Kathleen. 1996. Do We Have Enough Ethics in Government Yet?: An Answer from  
Fiduciary Theory. University of Illinois Law Review 1996

15 Clarke, G., K. Friesenbichler & M. Wong. 2015. Do Indirect Questions Reduce Lying About  
16 Corruption? Evidence from a Quasi-Field experiment. Comparative Economic Studies

17 Clarke, G.R. 2011. How Petty Is Petty Corruption? Evidence from Firm Surveys in Africa.  
18 World Development

19 Clarke, George R.G. & Lixin Colin Xu. 2004. Privatization, Competition, and Corruption:  
20 How Characteristics of Bribe Takers and Payers Affect Bribes to Utilities, Journal of Public  
Economics

21 Clarke, George R.G. 2012. What Do Managers Mean When They Say ‘Firms Like Theirs’  
22 Pay Bribes? International Journal of Economics & Finance

23 Claros, A. 2015. Removing Impediments to Sustainable Economic Development: The Case  
24 of Corruption. Journal of International Commerce, Economics & Policy 6(1)

25 Clausen, Bianca, Aart Kraay & Peter Murrell. 2011. “does Respondent Reticence Affect the  
26 Results of Corruption Surveys? Evidence from the World Bank Enterprise Survey for Nigeria”, in  
Susan Rose-Ackerman & Tina Soreide eds., International Handbook on the Economics of  
27 Corruption, Vol. 2 .

28 Clausen, Bianca, Aart Kraay & Zsolt Nyiri. 2011. Corruption and Confidence in Public  
Institutions: Evidence from a Global Survey. World Bank Economic Review



1 Clausen, Michael. 2012. Corruption and Democracy in Brazil. *Brasiliana: Journal for*  
2 *Brazilian Studies*.

3 Cleveland, Daniel C. 2007. Once Again, It Is Time to “Speak More Clearly” About  
4 §1346 and the Intangible Rights Doctrine in Mail and Wire Fraud. *Northern Kentucky Law*  
5 *Review*

6 Co, Edna Estifania A. Co. 2007. “Challenges to the Philippine Culture of Corruption”, in  
7 Sarah Bracking ed., *Corruption and Development: The Anti-Corruption Campaigns* (Palgrave  
Macmillan)

8 Coates, John. 2015. Corporate Speech and the First Amendment: History, Data, and  
9 Implications. Working paper.

10 Cockcroft, Laurence. 2012. *Global Corruption: Money, Power, and Ethics in the Modern*  
11 *World*. (Philadelphia: University of Pennsylvania Press).

12 Coco, G. & R. Lagravinese. 2014. Cronyism and Education Performance. *Economic*  
13 *Modelling*

14 Coffee, John C., Jr. 1998. Modern Mail Fraud: The Restoration of the Public/Private  
Distinction. *American Criminal Law Review*.

15 Cohen, J.R., L.W. Pant & D.J. Sharp. 1996. A Methodological Note on Cross-Cultural  
16 Accounting Ethics Research. *International Journal of Accounting*

17 Cohen, Joel M. & Adam P. Wolf. 2010. Narrow, Don’t Abolish, FCPA Facilitating  
18 Payments Exception. *New York Law Journal*

19 Cohen, Joel M., Michael P. Holland & Adam P. Wolf. 2008. Under the FCPA, Who Is a  
Foreign Official Anyway? *Business Lawyer*

20 Colares, Juscelino F. 2006. The Evolving Domestic and International Law Against Foreign  
21 Corruption: Some New and Old Dilemmas Facing the International Lawyers.

22 *Washington University Global Studies Law Review*

23 Colazingari, Silvia & Susan Rose-Ackerman. 1998. Corruption in a Paternalistic  
24 Democracy: Lessons from Latin American Countries. *Political Science Quarterly*

25 Colbran, Nicola. 2009. *Courage Under Fire: The First Five Years of the Indonesian Judicial*  
26 *Commission*. *Australian Journal of Asian Law*

27 Coldham, Simon. 1995. Legal Responses to State Corruption in Commonwealth Africa.  
*Journal of African Law*

28 Cole, Matthew A. 2007. *Corruption, Income and the Environment: An Empirical Analysis*.

1 Ecological Economics

2 Cole, Shawn A. & Anh Tran. 2011. "Evidence from the Firm: A New Approach to  
3 Understanding Corruption," in Susan Rose-Ackerman & Tina Soreide eds. International Handbook  
4 on the Economics of Corruption (Volume II)

5 Cole, W.M. 2015. Institutionalizing a Global Anti-Corruption Regime: Perverse Effects on  
6 Country Outcomes, 1984-2012. International Journal of Comparative Sociology

7 Collier, Michael W. 2002. explaining Corruption: An Institutional Choice Approach. Crime,  
8 Law & Social Change

9 Collier, Michael W. 2005. Political Corruption in the Caribbean Basin: Constructing a  
10 Theory to Combat Corruption (New York: Routledge).

11 Collier, P. & D. Dollar. 2004. Development Effectiveness: What Have We Learnt?  
12 Economic Journal

13 Collier, P. 2006. Is Aid Oil? An Analysis of Whether Africa Can Absorb More Aid. World  
14 Development

15 Collier, Paul. 2000. How to Reduce Corruption. African Development Review

16 Collignon, P., P. Athukorala, S. Senanayake & F. Khan. 2015. Antimicrobial Resistance:  
17 The Major Contribution of Poor Governance and Corruption to this Growing Problem. PLoS One

18 Collins, J.D., K. Uhlenbruck & P. Rodriguez. 2009 Why Firms Engage in Corruption: A  
19 Top Management Perspective. Journal of Business Ethics

20 Colombo, Gherardo. 2006. Investigating and Prosecuting Large-Scale Corruption: The  
21 Italian experience. Journal of International Criminal Justice

22 Colon, R. & H.G. Bladuell. 2014. Auditors and the Foreign Corrupt Practices Act: Lessons  
23 from Latin America. Accounting in Latin America (Research in Accounting in Emerging  
24 Economies)

25 Comaroff, J.L. & J. Comaroff. 2004. Policing Culture, Cultural Policing: Law and Social  
26 Order in Postcolonial South Africa. Law & Social Inquiry

27 Compte, Olivier, Ariane Lambert-Mogiliansky & Thierry Verdier. 2005. Corruption and  
28 Competition in Procurement Auctions. RAND Journal of Economics.

Conover, K. 2014. Rethinking Anti-Corruption Reforms: The View from Ancient Athens.  
Buffalo Law Review

Conroy, Patrick & Graeme Honter. 2011. Economic Analysis of Damages under the Foreign  
Corrupt Practices Act. New York: National Economic Research Associates.

Conry, Colleen A. 2010. Complying with the Foreign Corrupt Practices Act in the Global

Healthcare Industry. Journal of Health & Life Sciences Law

Contreras-Hermosilla, Arnoldo. 2002. Law Compliance in the Forestry Sector: An Overview. WBI Working Papers 28617, World Bank Institute, Washington, D.C.

Conway, Patrick & Xiaodong Wu. 2004. Corruption and Unemployment. Working paper.

Coogan, J., E. Lin Forder, J. Madir, N. Seiler & C. Wee. 2015. Combatting Fraud and Corruption in International Development. Journal of Financial Crime

Cooksey, Brian. 1998. Corruption in Aid: How Much Is Acceptable? Governance

Cooksey, Brian. 2002. Can Aid Agencies Really Help Combat Corruption? Forum on Crime & Society

Cooksey, Brian. 2010. "Trends in Corruption During the Mkapa Era – Who Wants to Know?", in Kjell Havnevik & Aida C. Isinika eds., Tanzania in Transition: From Nyerere to Mkapa (Dar es Salaam: Mkuki na Nyota Publishers).

Cooksey, Brian. 2012. Aid, Governance and Corruption Control: A Critical Assessment. Crime, Law & Social Change

Cooley, Alexander & Jason C. Sharman. 2015. Blurring the Line Between Licit and Illicit: Transnational Corruption Networks in Central Asia and Beyond. Central Asian Survey

Corbett, J. & R.N. Shiu. 2014. Leadership Succession and the High Drama of Political Conduct: Corruption Stories from Samoa. Pacific Affairs

Cordis, Adriana S. & Patrick L. Warren. 2014. Sunshine as Disinfectant: The Effect of State Freedom of Information Act Laws on Public Corruption. Journal of Public Economics

Cordis, Adriana S. 2014. Corruption and the Composition of Public Spending in the United States. Public Finance Review

Cordis, Adriana. 2009. Judicial Checks on Corruption in the United States. Economics of Governance

Cornelius, Wayne A. 2004. "Mobilizing Voting in the 2000 Elections: The Changing Efficacy of Vote Buying and Coercion in Mexican Electoral Politics", in Jorge I.

Dominguez & Chappell Lawson eds., Mexico's Pivotal Democratic Elections: Candidates, Voters, and the Presidential Campaign of 2000 (Stanford: Stanford University Press).

Coronel, S. 2010. "Corruption and the Watchdog Role of the News Media", in P. Norris ed., Public Sentinel: News Media and Governance Reform (Washington, DC: World Bank)

Corr, Christopher F. & Judd Lawler. 1999. Damned If You Do, Damned If You Don't? The OECD Convention and the Globalization of Anti-bribery Measures. Vanderbilt Journal of Transnational Law

- 1 Correani, Luca. 2005. Preferences, Development, and the Corruption Trap. *Economica*
- 2 *Politica*
- 3 Corrigan, Caitlin C. 2014. Breaking the Resource Curse: Transparency in the Natural
- 4 Resource Sector and the Extractive Industries Transparency Initiative. *Resources Policy*
- 5 Corstrange, Daniel. 2012. Vote Trafficking in Lebanon. *International Journal of Middle East*
- 6 *Studies*
- 7 Cosenz, F. & G. Noto. 2014. A Dynamic Simulation Approach to Frame Drivers and
- 8 Implications of Corruption Practices on Firm Performance. *European Management Review* 11(3-4)
- 9 Costa, L.D.A. & E.W. Mainardes. 2015. The Role of Corruption and Risk Aversion in
- 10 Entrepreneurial Intentions. *Applied Economics Letters*.
- 11 Costa, Samia. 2012. Do Freedom of Information Laws Decrease Corruption? *Journal of*
- 12 *Law, Economics & Organization*
- 13 Costas-Perez, Elena, Albert Sole-Olle & Pilar Sorribas-Navarro. 2012. Corruption Scandals,
- 14 Voter Information, and Accountability. *European Journal of Political Economy*
- 15 Coviello, Decio & Mario Mariniello. 2014. Publicity Requirements in Public Procurement:
- 16 Evidence from a Regression Discontinuity Design. *Journal of Public Economics*
- 17 Coviello, Decio & Stefano Gagliarducci. 2010. Building Political Collusion: Evidence from
- 18 Procurement Auctions. *IZA Discussion Papers* 4939.
- 19 Covington, Joseph P., Thomas C. Newkirk & Jessica Tillipman. 2005. FCPA Enforcement
- 20 in a Sarbanes-Oxley World. *Corporate Counselor* 20(3) (August, 2005).
- 21 Cowley, Edd & Sarah Smith. 2014. Motivation and Mission in the Public Sector: Evidence
- 22 from the World Values Survey. *Theory & Decision*
- 23 Cox, Gary R. & J. Morgan Kousser. 1981. "Turnout and Rural Corruption: New York as a
- 24 Test Case," *Am. J. Pol. Sci.*
- 25 Coxson, S.L. 2009. Assessment of Armenian Local Government Corruption Potential.
- 26 *Public Administration & Development*
- 27 Crabtree, J. 2014. Funding Local Government: Use (and Abuse) of Peru's Canon System.
- 28 *Bulletin of Latin American Research*
- Cragg, A.W. 1998. Business, Globalization, and the Logic and Ethics of Corruption. *Int'l J.*
- Cragg, Wesley & William Woof. 2002. The U.S. Foreign Corrupt Practices Act: A Study of
- Its Effectiveness. *Business & Society Review*
- Crawford, B. 2015. The Freezing Assets of Corrupt Officials Act: A Critical Analysis.

Canadian Business Law Journal

Cremades, Bernardo M. & David J.A. Cairns. 2003. Corruption, International Public Policy and the Duties of Arbitrators. *Dispute Resolution Journal*

Cremer, Georg. 2008. Corruption and Development Aid: Confronting the Challenges (Lynne Rienner).

Crites, D. Michael. 2012. The Foreign Corrupt Practices Act at Thirty-Five: A Practitioner's Guide. *Ohio State Law Journal*

Crivellaro, Antonio. 2013. The Courses of Action Available to International Arbitrators to Address Issues of Bribery and Corruption. *Transnational Dispute Management*

Crook, Richard & James Manor. 2000. Democratic Decentralization. World Bank Operations Evaluation Department Working Paper No. 11.

Cruz, Cesi & Philip Keefer. 2013. The Organization of Political Parties and the Politics of Bureaucratic Reform. World Bank Policy Research Working Paper 6686.

Cruz, Cesi. 2012. Social Networks and Electoral Strategies in the Philippines. Working paper.

Cruz, J.M. 2015. Police Misconduct and Political Legitimacy in Central America. *Journal of Latin American Studies*

Cuervo-Cazurra, Alvaro. 2006. Who Cares About Corruption? *Journal of International Business Studies*.

Cuervo-Cazurra, Alvaro. 2008. Better the Devil You Don't Know: Types of Corruption and FDI in Transition Economies. *Journal of International Management* 14(1): 12-17.

Cuervo-Cazurra, Alvaro. 2008. The Effectiveness of Laws Against Bribery Abroad. *Journal of International Business Studies* 39: 634-651.

Çule, Monika & Murray Fulton. 2005. Some Implications of the Unofficial Economy-Bureaucratic Corruption Relationship in Transition Countries. *Economics Letters*

Cullen, J.B., K.P. Parboteeah & M. Hoegl. 2004. Cross-National Differences in Managers' Willingness to Justify Ethically Suspect Behaviors: A Test of Institutional Anomie Theory. *Academy of Management Journal*

Curini, L. 2015. The Conditional Ideological Inducement to Campaign on Character Valence Issues in Multiparty Systems: The Case of Corruption. *Comparative Political Studies* 48(2): 168-.

Curini, Luigi & Paolo Martelli. 2015. A Case of Valence Competition in Elections. *Party Politics*

Czap, Hans & Kanybek Nur-tegin. 2012. Government Positions for Sale: A Model of Grand Corruption. Business & Politic.

d'Agostino, Giorgio, John Paule Dunne & Luca Pieroni. 2012. Corruption, Military Spending and Growth. Defense & Peace Economics

D'Alterio, Elisa. 2014. "Global Integrity: National Administrations versus Global Regimes", in Jean-Bernard Auby, Emmanuel Breen & Thomas Perroud eds., Corruption and Conflicts of Interest: A Comparative Law Approach

D'Souza, A. & D. Kaufmann. 2013. Who Bribes in Public Contracting and Why: Worldwide Evidence from Firms. Economics of Governance

D'Souza, Anna. 2011. The OECD Anti-Bribery Convention: Changing the Currents of Trade. Journal of Development Econoimcs

Dabla-Norris, E. et al. 2012. Investing in Public Investment: An Index of Public Investment Efficiency. Journal of Economic Growth

Dabla-Norris, E., M. Gradstein & G. Inchauste. 2008. What Causes Firms to Hide Output? The Determinants of Informality. Journal of Development Economics

Dabla-Norris, Era & Elisabeth Paul. 2006. What Transparency Can Do When Incentives Fail: an Analysis of Rent Capture. IMF Working Paper No. 06/146.

Dabla-Norris, Era & Paul Wade. 2001. Rent Seeking and Endogenous Income Inequality. IMF Working Paper No. 01/15.

Dabla-Norris, Era & Scott Freeman. 2004. Enforcement of Property Rights and Underdevelopment. Review of Development Economics

Dabla-Norris, Era. 2000. A Game-Theoretic Analysis of Corruption in Bureaucracies. IMF Working Paper No. 00/106.

Dada Ojo, M.O. 2014. The Nigeria Police and the Search for Integrity in the Midst of Diverse Challenges: An Effective Police Management Approach. International Journal of Police Science & Management

Dadalaui, Nina. 2007. "Political Corruption in Georgia", in Sarah Bracking ed., Corruption and Development: The Anti-Corruption Campaigns (Palgrave Macmillan)

Dahlstrom, Carl, Johannes Lindvall & Bo Rothstein. 2013. Corruption, Bureaucratic Failure, and Social Policy Priorities. Political Studies

Dahlstrom, Carl, Victor Lapuente & Jan Teorell. 2012. The Merit of Meritocratization: Politics, Bureaucracy, and the Institutional Deterrents of Corruption. Political Research Quarterly

Dahlstrom, Carl. 2015. "Bureaucracy and Corruption" , in Paul M. Heywood ed., The Routledge Handbook of Political Corruption (New York: Routledge)

- 1 Dai, M., M. Sidiropoulos & E. Spyromitros. 2015. Fiscal Policy, Institutional Quality and  
2 Central Bank Transparency. Manchester School
- 3 Dakolias, Maria & Kim Thachuk. 2000. Attacking Corruption in the Judiciary: A Critical  
4 Process in Judicial Reform. Wisconsin International Law Journal
- 5 Dal Bo, Ernesto & Martin A. Rossi. 2007. Corruption and Inefficiency: Theory and  
6 Evidence from Electric Utilities. Journal of Public Economics
- 7 Dal Bo, Ernesto & Rafael Di Tella. 2003. Capture by Threat. Journal of Political Economy
- 8 Dal Bo, Ernesto, Pedro Dal Bo & Rafael Di Tella. 2006. “Plata o Plomo? ”: Bribe and  
9 Punishment in a Theory of Political Influence. American Political Science Review
- 10 Dal Bo, Ernesto. 2007. Bribing Voters. American Journal of Political Science3.
- 11 Dalgaard, Carl-Johan & Ola Olsson. 2008. Windfall Gains, Political Economy and  
12 Economic Development. Journal of African Economies 17(Supp. 1)
- 13 Dalton, Marie M. 2006. Efficiency v. Morality: The Codification of Cultural Norms in the  
14 Foreign Corrupt Practices Act. NYU Journal of Law & Business
- 15 Daly, Conrad & Frank Fariello. 2012. Transforming Through Transparency: Opening Up the  
16 Bank’s Sanctions Regime. World Bank Legal Review
- 17 Damania, Richard, Per G. Fredriksson & J.A. List. 2003. Trade Liberalization, Corruption,  
18 and Environmental Policy Formation: Theory and Evidence. Journal of Environmental Economics  
19 & Managemen
- 20 Damania, Richard, Per G. Fredriksson & Muthukumara Mani. 2004. The Persistence of  
21 Corruption and Regulatory Compliance Failures: Theory and Evidence. Public Choice
- 22 Damarys, Canache & Micheal E. Allsion. 2005. Perceptions of Political Corruption in Latin  
23 American Democracies. Latin American Politics & Society,
- 24 Dane, E. & S. Sonenshein. 2015. On the Role of experience in Ethical Decision Making at  
25 Work: An Ethical expertise Perspective. Organizational Psychology Review
- 26 Danopoulos, Constantine Panos. 2014. The Cultural Roots of Corruption in Greece.  
27 Mediterranean Quarterly
- 28 Daoud, A. 2015. Quality of Governance, Corruption and Absolute Child Poverty in India.  
Journal of South Asian Development
- Darabare, S.J. 2014. Electoral Corrupt Practice and Electoral Offences: An Analysis. Journal



of Legal Analysis & Research

Darden, Keith. 2008. The Integrity of Corrupt States: Graft as an Informal Political Institution. *Politics & Society*

Darley, John M. 2004. The Cognitive and Social Psychology of Contagious Organizational Corruption. *Brooklyn Law Review*

Darley, W.K. 2012. Increasing Sub-Saharan Africa's Share of Foreign Direct Investment: Public Policy Challenges, Strategies, and Implications. *Journal of African Business*

Darr, Asaf. 2003. Gifting Practices and Interorganizational Relations: Constructing Obligation Networks in the Electronics Sector. *Sociological Forum*

Darrough, Masako N. 1999. Privatization and Corruption: Patronage vs. Spoils. *International Public Management Journal*

Darrough, Masako N. 2010. The FCPA and the OECD Convention: The Lessons from the U.S. experience. *Journal of Business Ethics*

Das, Anupam & Meaghan Marie Beatty Parry. 2011. Greasing or Sanding? GMM Estimation of the Corruption-Investment Relationship. *International Journal of Economics & Research*

Das, Jayoti & Cassandra DiRienzo. 2009. The Nonlinear Impact of Globalization on Corruption. *International Journal of Business & Finance Research*.

Das, Veena. 2015. Corruption and the Possibility of Life. *Contributions to Indian Sociology*

Dastidar, K.G. & D. Mukherjee. 2014. Corruption in Delegated Public Procurement Auctions. *European Journal of Political Economy*

Datu, T.T. & H.J. Nawawi. 2014. Implementation of Good Governance and Bureaucratic Reform in Indonesia. *International Journal of Academic Research*

David-Barrett, E. & K. Okamura. 2013. The Transparency Paradox: Why Corrupt Countries Join the Extractive Industries Transparency Initiative. Working paper.

David-Barrett, E. 2015. Nolan's Legacy: Regulating Parliamentary Conduct in Democratising Europe. *Parliamentary Affairs*

Davids, Cindy & Grant Schubert. 2012. "The Global Architecture of Foreign Bribery Control: Applying the OECD Bribery Convention", in Adam Graycar & Russell G. Smith eds., *Handbook of Global Research and Practice in Corruption*

Davidson, J.S. 2007. Politics-as-Usual on Trial: Anti-Corruption Campaigns in Indonesia. *Pacific Review*

Davidson, S. 1999. Okeahalam and Bah on Corruption: A Comment. *South African Journal*



of Economics

Davies, Mark. 2000. "Ethics in Government and the Issue of Conflicts of Interest", in Yassin El-Ayouty, Kevin J. Ford & Mark Davies eds., *Government Ethics and Law Enforcement: Toward Global Guidelines* (New York: Praeger Publishers)

Davis, Charles L., Roderic Ai Camp & Kenneth M. Coleman. 2004. *The Influence of Party Systems on Citizens' Perceptions of Corruption and Electoral Response in Latin America*. Comparative Political Studies

Davis, Diane E. 2006. *Undermining the Rule of Law: Democratization and the Dark Side of Police Reform in Mexico*. Latin American Politics & Society

Davis, J.H. & J.A. Ruhe. 2003. Perceptions of Country Corruption: Antecedents and Outcomes. *Journal of Business Ethics*

Davis, Jennifer. 2003. Corruption in Public Service Delivery: experience from South Asia's Water and Sanitation Sector. *World Development*

Davis, Kevin E. 2002. Self-Interest and Altruism in the Deterrence of Transnational Bribery. *American Law & Economics Review*

Davis, Kevin E. 2010. "does the Globalization of Anti-Corruption Law Help Developing Countries?", in *International Economic Law, Globalization and Developing Countries* 283-306 (Julio Faundez & Celine Tan eds.)

Davis, Kevin E. 2012. The Prospects for Anti-Corruption Law: Optimists versus Skeptics. *Hague Journal on the Rule of Law*

Davis, Kevin E. 2012. Why does the United States Regulate Foreign Bribery: Moralism, Self-Interest, or Altruism? *NYU Annual Survey of American Law*

Davis, Kevin E. 2014. Regulation of Foreign Bribery: The FCPA Enforcement Model. Working paper.

Davis, Kevin E. 2015. "Regulation of Foreign Bribery: The FCPA Enforcement Model", in Susan Rose-Ackerman & Paul Lagunes eds., *Greed, Corruption, and the Modern State*

Davis, Kevin E., Guillermo Jorge & Maira Rocha Machado. 2015. *Transnational Anticorruption Law in Action: Cases from Argentina and Brazil*. Law & Social Inquiry

Davis, Kevin. 2009. Civil Remedies for Corruption in Government Contracting: Zero Tolerance versus Proportional Liability. Working paper.

Davis, Kevin. 2013. "does the Globalization of Anti-Corruption Law Help Developing Countries?", in Susan Rose-Ackerman & Paul D. Carrington eds., *Anti-Corruption Policy: Can International Actors Play a Constructive Role?* (Durham: Carolina Academic Press)

Dawid, Herbert & Gustav Feichtinger. 1996. On the Persistence of Corruption. *Journal of*

## Economics

Dawson, H.J. 2014. Patronage from Below: Political Unrest in an Informal Settlement in South Africa. *African Affairs*

de Alencar, Carols Higino Rieiro & Ivo T. Gico, Jr. 2011. When Crime Pays: Measuring Judicial Performance Against Corruption in Brazil. *Law & Buisness Review of the Americas*

de Almeida, M.A. & B. Zagaris. 2015. Political Capture in the Petrobras Corruption Scandal: The Sad Tale of an Oil Giant. *Fletcher Forum of World Affairs*

De Beco, G. 2011. Monitoring Corruption from a Human Rights Perspective. *International Journal of Human Rights*

De Figueiredo, Miguel F.P., F. Daniel Hidalgo & Yuri Kasahara. 2011. When Do Voters Punish Corrupt Politicians? experimental Evidence from Brazil. Working Paper.

De George, Richard T. 1997 "Sullivan Type" Principles for U.S. Multinationals in Emerging Economies. *University of Pennsylvania Journal of International Economic Law*

De Graaf, Gjalt & L.W.J.C. Huberts. 2008. Portraying the Nature of Corruption Using an explorative Case Study Design. *Public Administration Review*

De Graaf, Gjalt, L. Huberts & J.M. Nelen. 2008. Is the Glass Half Full or Half Empty? Perceptions of the Scale and Nature of Corruption in the Netherlands. *Perspectives on European Politics & Society*

De Graaf, Gjalt, Patrick von Maravic & Pieter Wagenaar eds. 2010. *The Good Cause: Theoretical Perspectives on Corruption* (Farmington Hills: Budrich Publishing).

De Graaf, Gjalt. 2007. Causes of Corruption: Towards a Contextual Theory of Corruption. *Public Administration Quarterly*

de Groot, Henri, Gert-Jan Linders, Piet Rietveld & Uma Subramanian. 2004. The Institutional Determinants of Bilateral Trade Patterns. *Kyklos*

De Jaegere, Samuel. 2012. Principles for Anti-Corruption Agencies: A Game Changer. *Jindal Journal of Public Policy*

de Jong, Eelke & Christina Bogmans. 2011. does Corruption Discourage International Trade? *European Journal of Political Economy*

de Jong, G., P.A. Tu & H. van Ees. 2015. The Impact of Personal Relationships on Bribery Incidence in Transition Economies. *European Management Review*

de Koker, L. & K. Harwood. 2015. Supplier Integrity Due Diligence in Public Procurement: Limiting the Criminal Risk to Australia. *Sydney Law Review*

de Koker, Louis. 2012. "Applying Anti-Money Laundering Laws to Fight Corruption", in

- 1 Adam Graycar & Russell G. Smith eds., Handbook of Global Research and Practice in Corruption
- 2 de la Croix, David & Clara Delavallade. 2009. Growth, Public Investment and Corruption
- 3 with Failing Institutions. Economics of Governance
- 4 De la Croix, David & Clara Delavallade. 2011. Democracy, Rule of Law, Corruption
- 5 Incentives, and Growth. Journal of Public Economic Theory
- 6 de la Croix, David & Clara Delavallade. 2014. Why Corrupt Governments May Receive
- 7 More Foreign Aid. Oxford Economic Papers
- 8 de Maria, W. 2005. Whistleblower Protection: Is Africa Ready? Public Administration &
- 9 Development
- 10 De Maria, William. 2007. does African Corruption Exist? African Journal of Business
- 11 Ethics
- 12 De Maria, William. 2008. "The New War on African Corruption: Just Another Neo-Colonial
- 13 Adventure?", in Prasad, A. ed., Against the Grain: Advances in Postcolonial Organization Studies
- 14 (Copenhagen: Liber & Copenhagen Business School Press).
- 15 De Maria, William. 2008. Cross Cultural Trespass: Assessing African Anti-Corruption
- 16 Capacity. International Journal of Cross Cultural Management
- 17 De Maria, William. 2008. Measurements and Markets: Deconstructing the Corruption
- 18 Perception Index. International Journal of Public Sector Management
- 19 de Mello, L. 2004. Can Fiscal Decentralization Strengthen Social Capital? Public Finance
- 20 Review
- 21 De Mello, Luiz E. & Matias Barenstein. 2001. Fiscal Decentralization and Governance: A
- 22 Cross-Country Analysis. IMF Working Paper 01/71.
- 23 De Michele, Roberto. 2004. "The Follow-Up Mechanism of the Inter-American Convention
- 24 Against Corruption: Is the Glass Half-Empty?", Southwestern Journal of Law & Trade in the
- 25 Americas
- 26 de Michele, Roberto. 2013. "How Can International Financial Institutions Support
- 27 Countries' Efforts to Prevent Corruption under International Treaties and Agreements?", in Susan
- 28 Rose-Ackerman & Paul D. Carrington eds., Anti-Corruption Policy: Can International Actors Play a
- Constructive Role? (Durham: Carolina Academic Press)
- De Rosa, Donato, Nishaal Gooroochurn & Holger Gorg. 2010. Corruption and Productivity:
- Firm-Level Evidence from the BEEPS Survey. World Bank Policy Research Working Paper 5348.
- De Simone, Francesco & Bruce Zagaris. 2014. Impact of Foreign Bribery Legislation on
- Developing Countries and the Role of Donor Agencies. U4 Brief
- De Simone, Francesco & Nils Taxell. 2014. Donors and "Zero Tolerance for Corruption":

From Principle to Practice. U4 Brief 2014:2.

de Sousa, Luis & Marcelo Moriconi. 2013. Why Voters Do Not Throw the Rascals Out? – A Conceptual Framework for Analysing Electoral Punishment of Corruption. Crime, Law & Social Change

de Sousa, Luis, Peter Larmour & Barry Hindess eds. 2009. Governments, NGOs and Anti-Corruption: The New Integrity Warriors (London: Routledge).

de Sousa, Luis. 2002. Hard Responses to Corruption: Penal Standards and the Repression of Corruption. Crime, Law & Social Change

de Sousa, Luis. 2011. Anti-Corruption Agencies: Between Empowerment and Irrelevance. Crime, Law & Social Change

de Speville, Bertrand. 2010. Overcoming Corruption: The Essentials. BPR Publishers.

de Speville, Betrand. 2010. Anticorruption Commissions: The ‘Hong Kong Model’ Revisited. Asia-Pacific Review

de Vaal, Albert & Wouter Ebben. 2011. Institutions and the Relation between Corruption and Economic Growth. Review of Development Economics

de Waal, A. 2014. When Kleptocracy Becomes Insolvent: Brute Causes of the Civil War in South Sudan. African Affairs

DeAses, Anne Janet. 2003. Developing Countries: Increasing Transparency and Other Methods of Eliminating Corruption in the Public Procurement Process. Public Contract Law Journal

DeBacker, Jason, Bradley T. Heim & Anh Tran. 2015. Importing Corruption Culture from Overseas: Evidence from Corporate Tax Evasion in the United States. Journal of Financial Economics

DeCelles, K.A., D.S. DeRue, J.D. Margolis & T.L. Ceranic. 2012. does Power Corrupt or Enable: When and Why Power Facilitates Self-Interested Behavior. Journal of Applied Psychology

Dechenaux, Emmanuel & Andrew Samuel. 2014. Announced vs. Surprise Inspections with Tipping Off. European Journal of Political Economy

Dechenaux, Emmanuel & Andrew Samuel. 2012. Preemptive Collusion, Hold-Up and Repeated Interactions. Economica.

Deckert, Joseph, Mikhail Myagkov & Peter C. Ordeshook. 2011. Benford’s Law and the Detection of Election Fraud. Political Analysis

Deflem, Mathieu. 1995. Corruption, Law, and Justice: A Conceptual Clarification. Journal of Criminal Justice

Dehn, J., R. Reinikka & J. Svensson. 2003. “Survey Tools for Assessing Performance in

1 Service Delivery”, in F. Bourguignon & L.A.P. da Silva eds., *The Impact of Economic Policies on*  
 2 *Poverty and Income Distribution: Evaluation Techniques and Tools* (Washington, DC: World Bank  
 & Oxford University Press).

3 Deininger, Klaus & Paul Mpuga. 2005. *Does Greater Accountability Improve the Quality of*  
 4 *Public Service Delivery? Evidence from Uganda*. World Development

5 Dekel, Eddie, Matthew O. Jackson & Asher Wolinsky. 2007. *Vote Buying: General*  
 6 *Elections*. Journal of Political Economy

7 Del Monte, Alfredo & Erasmo Papagni. 2001. *Public expenditure, Corruption, and*  
 8 *Economic Growth: The Case of Italy*. European Journal of Political Economy

9 Del Monte, Alfredo & Erasmo Papagni. 2007. *The Determinants of Corruption in Italy:*  
 10 *Regional Panel Data Analysis*. European Journal of Political Economy

11 dela Rama, Marie. 2012. *Corporate Governance and Corruption: Ethical Dilemmas of Asian*  
 12 *Business Groups*. Journal of Business Ethics

13 Delaney, Patrick X. 2007. *Transnational Corruption: Regulation Across Borders*. Virginia  
 14 *Journal of International Law*

15 Delavallade, Clara. 2006. *Corruption and Distribution of Public Spending in Developing*  
 16 *Countries*. Journal of Economics and Finance

17 Delavallade, Clara. 2012. *What Drives Corruption? Evidence from North African Firms*.  
 18 *Journal of African Economics*

19 DeLeon, P. 1989. *Public Policy Implications of Systemic Political Corruption*. Corruption &  
 20 *Reform*

21 Delgado, M.S., N. Mccloud & S.C. Kumbhakar. 2014. *A Generalized Model of Corruption,*  
 22 *Foreign Direct Investment, and Growth*. Journal of Macroeconomics

23 Dell’Anno, Roberto & Desiree Teobaldelli. 2015. *Keeping both Corruption and the Shadow*  
 24 *Economy in Check: The Role of Decentralization*. International Tax & Public Finance

25 Della Porta, Donatella & Alberto Vannucci. 1999. *Corrupt exchanges: Actors, and*  
 26 *resources, mechanisms of political corruption*. New York: Walter de Gruyter, Inc.

27 Della Porta, Donatella & Alberto Vannucci. 1997. *The Resources of Corruption: Some*  
 28 *Reflections from the Italian Case*. Crime, Law & Social Change

Della Porta, Donatella & Alberto Vannucci. 2007. *Corruption and Anti-Corruption: The*  
*Political Defeat of “Clean Hands” in Italy*. West European Politics.

Della Porta, Donatella & Alberto Vanucci. 1997. *The “Perverse Effects” of Political*  
*Corruption* . Political Studies

1 Della Porta, Donatella. 1996. Actors in Corruption: Business Politicians in Italy.  
International Social Science Journal

2 Della Porta, Donatella. 2000. "Social Capital, Beliefs in Government, and Political  
3 Corruption," in Susan Pharr & Robert Putnam, eds. Disaffected Democracies: What's Troubling the  
4 Trilateral Countries? (Princeton: Princeton University Press)

5 Della Porta, Donatella. 2001. A Judges' Revolution? Political Corruption and the Judiciary  
in Italy. European Journal of Political Research

6 Della Porta, Donatella. 2004. Political Parties and Corruption: Ten Hypotheses on Five  
7 Vicious Circles. Crime, Law & Social Change

8 Della Porta, Donatella & Alberto Vannucci. 2012. The Hidden Order of Corruption.  
9 Farnham: Ashgate.

10 Delzangles, Hubert. 2014. "Regulatory Authorities and Conflicts of Interest", in Jean-  
Bernard Auby, Emmanuel Breen & Thomas Perroud eds., Corruption and Conflicts of Interest: A  
11 Comparative Law Approach

12 Demas, Reagan R. 2008. All Hands on Deck: Collaborative Global Strategies in the Battle  
13 Against Corruption and Human Trafficking in Africa. University of St. Thomas Law Journal.

14 Demas, Reagan R. 2011. Moment of Truth: Development in Sub-Saharan Africa and Critical  
Alternations needed in Application of the Foreign Corrupt Practices Act and Other Anti-Corruption  
15 Initiatives. American University International Law Review

16 Demas, Regan R. 2014. Biting the Hands that Feed: Corporate Charity and the U.S. Foreign  
17 Corrupt Practices Act. American University International Law Review

18 Deming, S.H. 2014. Canada's Corruption of Foreign Public Officials Act and Secret  
Commissions Offense. American University International Law Review

19 Deming, Stuart H. 1999. Foreign Corrupt Practices. International Law

20 Deming, Stuart H. 2006. The Potent and Broad-Ranging Implications of the Accounting and  
21 Record-Keeping Provisions of the Foreign Corrupt Practices Act. Journal of Criminal Law &  
22 Criminology

23 den Nieuwenboer, Niki A. & Muel Kaptein. 2008. Spiraling Down into Corruption: A  
24 Dynamic Analysis of the Social Identity Processes That Cause Corruption in Organizations to  
Grow. Journal of Business Ethics

25 Deng, X.M. et al. 2014. Analysis of Fraud Risk in Public Construction Projects in China.  
26 Public Money & Management

27 Denisova-Schmidt, E. & M. Huber. 2014. Regional Differences in Perceived Corruption  
28 among Ukrainian Firms. Eurasian Geography & Economics

- 1 Denolf, Bert. 2008. The Impact of Corruption on Foreign Direct Investment. Journal of  
World Investment & Trade
- 2
- 3 Department for International Development (UK). 2015. Why Corruption Matters:  
Understanding Causes, Effects and How to Address Them.
- 4
- 5 Depken, Craig A., II & Courtney L. Lafountain. 2006. Fiscal Consequences of Public  
Corruption: Empirical Evidence from State Bond Ratings, Public Choice
- 6
- 7 Desposato, Scott. 2012. Corruption and Electoral Rules. Working Paper.
- 8
- 9 Devadoss, S. & J. Luckstead. 2015. Can a Corrupt Ruling Party Win a Re-Election Through  
Vote Buying? Applied Economics 1-6.
- 10
- 11 Devarajan, S., S. Khemani & M. Walton. 2014. Can Civil Society Overcome Government  
Failure in Africa? World Bank Research Observer
- 12
- 13 Dewan, Torun & David P. Myatt. 2007. Scandal, Protection, and Recovery in the Cabinet.  
American Political Science Review.
- 14
- 15 Dewi, S. 2014. Balancing Privacy Rights and Legal Enforcement: Indonesian Practices.  
International Journal of Liability & Scientific Enquiry
- 16
- 17 Dey, Harendra K. 1989. The Genesis and Spread of Economic Corruption: A Microtheoretic  
Interpretation. World Development
- 18
- 19 Dhaliwal, Iqbal & Rema Hanna. 2013. Deal with the Devil: The Success and Limitations of  
Bureaucratic Reform in India. Working paper.
- 20
- 21 Dheera-aumpon, Siwapong. 2015. Can Shareholder Rights Protection Reduce Corruption in  
Lending? International Journal of Monetary Economics & Finance
- 22
- 23 Di John, Jonathan. 2011. Is There Really a Resource Curse? A Critical Survey of Theory  
and Evidence. Global Governance
- 24
- 25 Di Puccio, Lili. 2010. Anti-Corruption Interventions in Georgia. Global Crime
- 26
- 27 Di Puccio, Lili. 2014. The Construction of Success in Anti-Corruption Activity in Georgia.  
East European Politics
- 28
- Di Tella, R. & R. MacCulloch. 2009. Why doesn't Capitalism Flow to Poor Countries?  
Brookings Papers on Economic Activity
- Di Tella, R., J. Donna & R. MacCulloch. 2008. Crime and Beliefs: Evidence from Latin  
America. Economics Letters.
- Di Tella, Rafael & Ernesto Schargrotsky. 2003. The Role of Wages and Auditing During a  
Crackdown on Corruption in the City of Buenos Aires. Journal of Law & Economics



1 Di Tella, Rafael & Federico Weinschelbaum. 2008. Choosing Agents and Monitoring  
Consumption: A Note on Wealth as a Corruption-Controlling Device. *Economic Journal*

2 Di Tella, Rafael & Ignacio Franceschelli. 2011. Government Advertising and Media  
3 Coverage of Corruption Scandals. *American Economic Journal: Applied Economics*

4 Di Tella, Raphael & William Savedoff. 2001. "Shining Light in Dark Corners," in *Diagnosis*  
5 *Corruption: Fraud in Latin America's Public Hospitals* (Washington, D.C.: Inter-American  
Development Bank).

6 Diaby, Aboubacar & Kevin Sylwester. 2014. Bureaucratic Competition and Public  
7 Corruption: Evidence from Transition Countries. *European Journal of Political Economy*

8 Diaby, Aboubacar & Kevin Sylwester. 2015. Corruption and Market Competition: Evidence  
9 from Post-Communist Countries. *World Development*

10 Diaz-Cayeros, Alberto, Beatriz Magaloni & Vidal Romero. 2015. "Caught in the Crossfire:  
The Geography of Extortion and Police Corruption in Mexico", in Susan Rose-Ackerman & Paul  
11 Lagunes eds., *Greed, Corruption, and the Modern State* .

12 DiBiagio, Thomas M. 2000. Politics and the Criminal Process: Federal Public Corruption  
13 Prosecutions of Popular Public Officials Under the Honest Services Component of the Mail and  
Wire Fraud Statutes. *Dickinson Law Review*

14 Dick, Howard & Simon Butt. 2013. Is Indonesia as Corrupt as Most People Believe and Is It  
15 Getting Worse? Melbourne Law Schoole, CILIS Policy Paper.

16 Dicke, R.A., R.C. Henderickson & S. Kutz. 2014. NATO's Mafia Ally: The Strategic  
17 Consequences of Bulgarian Corruption. *Comparative Strategy*

18 Dickerson, Claire Moore. 1999. Political Corruption: Free-Flowing Opportunism.  
19 *Connecticut Journal of International Law*

20 Dietz, S., E. Neumayer & I. De Soysa. 2007. Corruption, the Resource Curse and Genuine  
Saving. *Environment & Development Economics*

21 diGenova, Joseph E. 1998. The Independent Counsel Act: A Good Time to End a Bad Idea.  
22 *Georgetown Law Journal*

23 Dillon, Amrita & Mandar Oak. 2015. Legalization of Bribe Giving When Bribe Type Is  
24 Endogenous. *Journal of Public Economic Theory*

25 Dillon, Amrita, Rebecca B. Morton & Jean-Robert Tyran. 2015. Corruption in Committees:  
An experimental Study of Information Aggregation Through Voting. *Journal of Public Economic*  
26 *Theory*

27 Dimant, E. & B. Hehenkamp. 2014. More Money More Problems? An experimental  
28 Investigation of the Impact of Wage Raises on Individual Corruptibility under Uncertainty.  
Working paper.



1 Dimant, Eugen, Tim Krieger & Daniel Meierrieks. 2013. The Effect of Corruption on  
2 Migration, 1985-2000. Applied Economics Letters

3 Dimant, Eugen, Tim Krieger & Margarete Redlin. 2013. A Crook Is a Crook ... But Is He  
4 Still a Crook Abroad? On the Effect of Immigration on Destination-Country Corruption. Working  
5 paper.

6 Dimant, Eugen. 2014. The Antecedents and Effects of Corruption – A Reassessment of  
7 Current (Empirical) Findings. MPRA Working Paper

8 Dimant, Eugen. 2014. The Nature of Corruption – An Interdisciplinary Perspective. Center  
9 for International Economics, Working Paper

10 Dimitrov, M. 2015. Internal Government Assessments of the Quality of Governance in  
11 China. Studies in Comparative International Development

12 Dimitrova-Grajzi, Valentina, Peter Grajzi & A. Joseph Guse. 2012. Trust, Perceptions of  
13 Corruption, and Demand for Regulation: Evidence from Post-Socialist Countries. Journal of Socio-  
14 Economics

15 Dimock, Michael A. & Gary C. Jacobson. 1995. Checks and Choices: The House Bank  
16 Scandal's Impact on Voters in 1992. Journal of Politics

17 Dincer, Oguzhan & Michael Johnston. 2015. Measuring Illegal and Legal Corruption in  
18 American States: Some Results from the Edmond J. Safra Center for Ethics Corruption in America  
19 Survey. Working paper.

20 Dincer, Oguzhan C. & Burak Gunalp. 2012. Corruption and Income Inequality in the United  
21 States. Contemporary Economic Policy

22 Dincer, Oguzhan C. & Michael Johnston. 2014. Corruption Issues in State and Local  
23 Politics: Is Political Culture a Deep Determinant? Working paper.

24 Dincer, Oguzhan C. 2008. Ethnic and Religious Diversity and Corruption. Economics  
25 Letters

26 Dincer, Oguzhan C., Christopher J. Ellis & Glen R. Waddell. 2010. Corruption,  
27 Decentralization and Yardstick Competition. Economics of Governance

28 Dininio, Phyllis & Robert W. Orttung. 2005. explaining Patterns of Corruption in the  
Russian Region. World Politics.

Dininio, Phyllis. 2005. "The Risks of Recorruption", in Bertram Spector ed. Fighting  
Corruption in Developing Countries: Strategies and Analysis (Bloomfield, CT: Kumarian Press)

Diokno, Benjamin E. 2012. Fiscal Decentralization after 20 Years: What Have We Learned?  
Where Do We Go from Here? Philippine Review of Economics 49(1): Dion, M. 2011. Corruption,  
Fraud and Cybercrime as Dehumanizing Phenomena. International Journal of Social Economics

1 DiPietro, William R. & Michele S. Flint. 2012. Political Corruption, Economic Incentive,  
2 Educational Resource Input, and the Quality of Human Capital: A Panel Analysis Over 84 Twenty-  
3 Five Years for the Fifty U.S. States. *International Journal of Economics & Finance*

4 DiRienzo, C. & J. Das. 2015. Innovation and the Role of Corruption and Diversity: A Cross-  
5 Country Study. *International Journal of Cross Cultural Management* DiRienzo, Cassandra E.,  
6 Joyoti Das, Kathryn T. Cort & John Burbridge Jr. 2007.

7 Corruption and the Role of Information. *Journal of International Business Studies*

8 Disch, Arne, Endre Vigeland & Geir Sundet. 2009. Anti-Corruption Approaches: A  
9 Literature Review. Sutdy 2/2208. Oslo: Norad.

10 Dissou, Yazid & Tatsiana Yakautsava. 2012. Corruption, Growth, and Taxation. *Theoretical*  
11 *Economics Letters*

12 Ditton, Jason. 1977. Perks, Pilferage and the Fiddle: The Historical Structure of Invisible  
13 Wages. *Theory & Society*.

14 Dix, S., K. Hussmann & G. Walton. 2012. Risks of Corruption to State Legitimacy and  
15 Stability in Fragile Situations. U4 Issue No. 3.

16 Dixit, Avinash. 2014. How Business Community Institutions Can Help Fight Corruption.  
17 World Bank Policy Research Working Paper 6954.

18 Djankov, Simeon, Caralee McLiesh, Tatiana Nenova & Andrei Shleifer. 2003. Who Owns  
19 the Media? *Journal of Law & Economics*

20 Djankov, Simeon, Jose G. Montalvo & Marta Reynal-Querol. 2008. The Curse of Aid.  
21 *Journal of Economic Growth*

22 Djankov, Simeon, Rafael La Porta, Florencio Lopez-de-Silanes & Andrei Shleifer. 2010.  
23 Disclosure by Politicians. *American Economic Journal: Applied Economics*

24 Djankov, Simeon, Rafael La Porta, Florencio Lopez-de-Silanes & Andrei Shleifer. 2002.  
25 The Regulation of Entry. *Quarterly Journal of Economics*

26 Dobratz, B.A. & S. Whitfield. 1992. does Scandal Influence Voters' Party Preference? The  
27 Case of Greece During the Papandreou Era. *European Sociological Review*

28 Dobson, Carlyn & Antonio Rodriguez Andres. 2011. Is Corruption Really Bad for  
Inequality? Evidence from Latin America. *Journal of Development Studies*

Dobson, Stephen & Carlyn Ramlogan-Dobson. 2010. Is There a Trade-Off between  
Corruption and Inequality? Evidence from Latin America. *Economics Letters*

Dobson, Stephen & Carlyn Ramlogan-Dobson. 2012. Inequality, Corruption and the  
Informal Sector. *Economics Letters*

1 Dobson, Stephen & Carlyn Ramlogan-Dobson. 2012. Why Is Corruption Less Harmful to  
2 Inequality in Latin America? World Development.

3 Doh, J., P. Rodriguez, K. Uhlenbruck, J. Collins & L. Eden. 2003. Coping with Corruption  
4 in Foreign Markets. Academy of Management Executive

5 Doig, A. & D. Norris. 2012. Improving Anticorruption Agencies as Organisations. Journal  
6 of Financial Crime

7 Doig, A. & M. Tisne. 2009. A Candidate for Relegation? Corruption, Governance  
8 Approaches and the (Re)construction of Post-War States. Public Administration & Development

9 Doig, A. & S. McIvor. 1999. Corruption and its Control in the Developmental Context: An  
10 Analysis and Selective Review of the Literature. Third World Quarterly

11 Doig, A., D. Watt & R. Williams. 2006. Hands-On or Hands-Off? Anti-Corruption Agencies  
12 in Action, Donor expectations, and a Good Enough Reality. Public Administration & Development

13 Doig, Alan & Heather Marquette. 2005. Corruption and Democratisation: The Litmus Test  
14 of International Donor Agency Intentions? Futures

15 Doig, Alan & Robin Theobald, eds. 2000. Corruption and Democratization (London: Frank  
16 Cass).

17 Doig, Alan & Stephanie McIvor. 2003. The National Integrity System: Assessing  
18 Corruption and Reform. Public Administration & Development

19 Doig, Alan & Stephen Riley. 1998. "Corruption and Anti-Corruption Strategies: Issues and  
20 Case Studies from Developing Countries", in Corruption: Integrity Improvement Initiatives in  
21 Developing Countries.

22 Doig, Alan, David Watt & Robert Williams. 2007. Why Do Developing Country Anti-  
23 Corruption Commissions Fail to Deal with Corruption? Understanding the Three Dilemmas of  
24 Organisational Development, Performance expectations, and Donor and Government Cycles. Public  
25 Administration & Development

26 Doig, Alan, Stephanie McIvor & Robin Theobald. 2006. Using Corruption Indicators or  
27 Descriptors to Assess State Development: Numbers, Nuances and Moving Targets. International  
28 Review of Administrative Sciences

Doig, Alan. 1995. Good Government and Sustainable Anti-Corruption Strategies: A Role  
for Independent Anti-Corruption Agencies? Public Administration and Development

Doig, Alan. 1998. Dealing with Corruption: The Next Steps. Crime, Law & Social Change

Doig, Alan. 1999. In the State We Trust? Democratisation, Corruption and Development.  
Journal of Commonwealth & Comparative Politics

Pg 1594 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Doig, Alan. 2006. Dirty Hands and the Donors: Dealing with Corruption in a Post-Mugabe Zimbabwe. Political Quarterly

Doig, Alan. 2007. Not as Easy as it Sounds? Delivering the National Integrity System Approach in Practice: The Case Study of the National Anticorruption Programme in Lithuania. Public Administration Quarterly

Doig, Alan. 2014. Roadworks Ahead? Addressing Fraud, Corruption and Conflict of Interest in English Local Government. Local Government Studies

Dolan, Kathleen, Bruce McKeown & James M. Carlson. 1988. Popular Conceptions of Political Corruption: Implications for the Empirical Study of Political Ethics. Corruption and Reform

Dollar, David, Raymond Fisman & Roberta Gatti. 2001. Are Women Really the “Fairer” Sex? Corruption and Women in Government. Journal of Economic Behavior

Domfeh, Kwame Ameyaw & Justice Nyigmah Bawole. 2011. Muting the Whistleblower Through Retaliation in Selected African Countries. Journal of Public Affairs.

Domokos, L. 2015. Strengthening Integrity Against Corruption: The Integrity Project of the State Audit Office of Hungary. International Journal of Government Auditing

Donadelli, M., M. Fasan & B. Magnanelli. 2014. The Agency Problem, Financial Performance and Corruption: Country, Industry and Firm Level Perspectives. European Management Review

Donais, T. 2003. The Political Economy of Stalemate: Organised Crime, Corruption and Economic Development in Post-Dayton Bosnia. Conflict, Security & Development

Donaldson, T. & T.W. Dunfee. 1999. Ties that Bind: A Social Contracts Approach to Business Ethics (Boston, MA: Harvard Business School Press).

Donchev, Dilyan & Gergely Ujhelyi. 2014. What Do Corruption Indices Measure? Economics & Politics

Dong, Bin & Benno Torgler. 2009. Corruption and Political Interest: Empirical Evidence at the Micro Level. Journal of Interdisciplinary Economics

Dong, Bin & Benno Torgler. 2009. Corruption, Social Norms and Political Interest. Empirical Economics Letters.

Dong, Bin & Benno Torgler. 2010. The Consequences of Corruption: Evidence from China. Working Paper.

Dong, Bin & Benno Torgler. 2011. Democracy, Property Rights, Income Equality, and Corruption. Working paper.

Dong, Bin & Benno Torgler. 2012. Corruption and Social Interaction: Evidence from China.

Journal of Policy Modeling

Dong, Bin & Benno Torgler. 2013. Causes of Corruption: Evidence from China. *China Economic Review*

Dong, Bin, Uwe Dulleck & Benno Torgler. 2012. Conditional Corruption. *Journal of Economic Psychology*

Donohue, J. 2015. Combatting Fraud, Waste and Abuse: A More Proactive Approach is the Answer. *Journal of Government Financial Management*

Dormaels, Arne. 2014. Perceptions of Corruption in Flanders: Surveying Citizens and Police. A Study on the Influence of Occupational Differential Association on Perceptions of Corruption. *Policing & Society*

Dorotinsky, W. & S. Pradhan. 2007. "exploring Corruption in Public Financial Management", in J.E. Campos & S. Pradhan eds., *The Many Faces of Corruption: Tracking Vulnerabilities at the Sector Level* (Washington, D.C.: World Bank).

Dort, T., P. Meon & K. Sekkat. 2014. does Investment Spur Growth Everywhere? Not Where Institutions Are Weak. *Kyklos*

dos Santos, L.A. & P.M.T. da Costa. 2014. The Contribution of Lobby Regulation Initiatives in Addressing Political Corruption in Latin America. *Journal of Public Affairs*

Doty, James R. 2007. Toward a Reg FCPA: A Modest Proposal for Change in Administering the Foreign Corrupt Practices Act. *Business Lawyer*

Douoguih, K.C. 2005. does Mineral Resource Dependence Foster Corruption? Working paper.

Dowd, Raymond J. 1991. Civil RICO Misread: The Judicial Repeal of the 1988

Amendments to the Foreign Corrupt Practices Act. *Fordham International Law Journal* .

Drabek, Z. & W. Payne. 2001. The Impact of Transparency on Foreign Direct Investment. WTO Working Paper ERAD-99-02.

Drackle, Dorle. 2005. "Where the Jeeps Come From: Narratives of Corruption in the Alentejo (Southern Portugal)", in Dieter Haller & Chris Shore eds., *Corruption: Anthropological Perspectives* (Pluto Press).

Dreher, A. & T. Herzfeld. 2005. "The Economic Costs of Corruption: A Survey and New Evidence", in F.N. De Luca ed., *Economic Corruption: Detection, Costs and Prevention* (Nova Science).

Dreher, A., P.G. Meon & F. Schneider. 2014. The Devil Is in the Shadow. Do Institutions Affect Income and Productivity or Only Official Income and Official Productivity? *Public Choice*

1 Dreher, Axel & Friedrich Schneider. 2010. Corruption and the Shadow Economy: An  
2 Empirical Analysis.

3 Dreher, Axel & Lars-H.R. Siemers. 2009. The Intriguing Nexus Between Corruption and  
4 Capital Account Restrictions.

5 Dreher, Axel & Martin Gassebner. 2013. Greasing the Wheels? The Impact of Regulations  
6 and Corruption on Firm Entry.

7 Dreher, Axel, Christos Kotsogiannis & Steve McCorriston. 2007. Corruption Around the  
8 World: Evidence from a Structural Model. Journal of Comparative Economics

9 Dreher, Axel, Christos Kotsogiannis & Steve McCorriston. 2009. How Do Institutions  
10 Affect Corruption and the Shadow Economy? International Tax & Public Finance

11 Drezner, Daniel W. & Nancy Hite-Rubin. 2014. does Military Power Attract (Corrupt)  
12 Foreign Investment? An Empirical Investigation. Working paper.

13 Drugov, Mikhail, John Hamman & Danila Serra. 2013. Intermediaries in Corruption: An  
14 experiment. experimental Economics

15 Drugov, Mikhail. 2010. Competition in Bureaucracy and Corruption. Journal of  
16 Development Economics

17 Drury, A. Cooper, Jonathan Kriekhaus & Michael Lusztig. 2006. Corruption, Democracy,  
18 and Economic Growth, International Political Science Review

19 Du, J. 2008. Corruption and Corporate Finance Patterns: An International Perspective.  
20 Pacific Economic Review 13: 183-208.

21 Dubois, Pascale Hélène & Aileen Elizabeth Nowlan. 2010. Global Administrative Law and  
22 the Legitimacy of Sanctions Regimes in International Law. Yale Journal of International Law  
23 Online

24 Dubois, Pascale Hélène et al. 2013. "Sanctions at the World Bank and the Inter-American  
25 Development Bank: Addressing Corruption and Fraud in Development Assistance", in Alessandra  
26 Del Debbio et al., eds., Temas de Anticorrupção & Compliance

27 Dubois, Pascale Helene. 2012. Domestic and International Administrative Tools to Combat  
28 Fraud & Corruption: A Comparison of US Suspension and Debarment with the World Bank's  
Sanctions System. University of Chicago Legal Forum

Dubrovskiy, Vladimir. 2006. Towards Effective Anti-Corruption Strategies in Ukraine:  
Removing the Cornerstone without Toppling the Building. Centre for Social and Economic  
Research (Warsaw): Studies & Analysis No. 322.

Duckett, Jane. 2001. Bureaucrats in Business, Chinese Style: The Lessons of Market Reform  
and State Entrepreneurialism in the People's Republic of China. World Development

Dudas, Stefan & Nikolaos Tsolakidis. 2013. Host-State Counterclaims: A Remedy for Fraud or Corruption in Investment-Treaty Arbitration? Transnational Dispute Management

Dudley, L. & C. Montmarquette. 1987. Bureaucratic Corruption as a Constraint on Vote Choice.

Duflo, Esther & Petia Topalova. 2004. Underappreciated Service: Performance, Perceptions, and Women Leaders in India. Working paper.

Duflo, Esther, Michael Greenstone, Rohini Pande & Nicholas Ryan. 2013. Truth-Telling by Third-Party Auditors and the Response of Polluting Firms: experimental Evidence from India. Quarterly Journal of Economics

Duflo, Esther, Rema Hanna & Stephen P. Ryan. 2012. Incentives Work: Getting Teachers to Come to School. American Economic Review

Dufwenberg, Martin & Giancarlo Spagnolo. 2015. Legalizing Bribe Giving. Economic Inquiry 3.

Dugard, John. 2013. "Corruption: Is there a Need for a New Convention?", in Susan Rose-Ackerman & Paul D. Carrington eds., Anti-Corruption Policy: Can International Actors Play a Constructive Role? (Durham: Carolina Academic Press)

Duggan, M. & S. Levitt. 2002. Winning Isn't Everything: Corruption in Sumo Wrestling. American Economic Review

Dumas, L. J. Wedel. & G. Callman. 2010. Confronting Corruption, Building Accountability: Lessons from the World of International Development Advising. (New York: Palgrave).

Duncan, Christopher J. 2000. Comments on the 1998 Foreign Corrupt Practices Act Amendments: Moral Empiricism or Moral Imperialism? Asian-Pacific Law & Policy Journal

Duncan, Nick. 2006. "The Non-Perception Based Measurement of Corruption: A Review of Issues and Methods from a Policy Perspective", in Charles Sampford, Arthur Shacklock, Carmel Connors & Fredrik Galtung eds., Measuring Corruption (Ashgate)

Dunfee, Thomas W. & David Hess. 2001. Getting from Salbu to the "Tipping Point": The Role of Corporate Action Within a Portfolio of Anti-Corruption Strategies. Northwestern Journal of International Law & Business

Dusek, Libor, Andreas Ortman & Lizal Lubomir. 2005. Understanding Corruption and Corruptibility Through experiments. Prague Economic Papers

Dusha, E. 2015. Intermediated Corruption. International Economic Review.

Dussuyer, Inez, Stephen Mumford & Glenn Sullivan. 2012. "Reporting Corrupt Practices in the Public Interest: Innovative Approaches to Whistleblowing", in Adam Graycar & Russell G. Smith eds., Handbook of Global Research and Practice in Corruption



- 1 Dutt, Pushan & Daniel Traca. 2010. Corruption and Bilateral Trade Flows: Extortion or  
Evasion? Review of Economics & Statistics
- 2 Dutt, Pushan. 2009. Trade Protection and Bureaucratic Corruption: An Empirical  
3 Investigation. Canadian Journal of Economics
- 4 Dutta, Bhaskar & Poonam Gupta. 2012. How Indian Voters Respond to Candidates with  
5 Criminal Charges: Evidence from the 2009 Lok Sabha Elections. Working paper.
- 6 Dutta, I. & A. Mishra. 2004. Corruption and Competition in the Presence of Inequality and  
Market Imperfections. Working paper.
- 7 Dutta, Nabamita, Saibal Kar & Sanjukta Roy. 2013. Corruption and Persistent Informality:  
8 An Empirical Investigation for India. International Review of Economics & Finance
- 9 Duvanova, Denissa. 2012. Bureaucratic Discretion and the Regulatory Burden: Business  
10 Environments Under Alternative Regulatory Regimes. British Journal of Political Science
- 11 Duvanova, Dinissa. 2014. Economic Regulations, Red Tape, and Bureaucratic Corruption in  
12 Post-Communist Economies. World Development
- 13 Dwivedi, O.P., D.S. Mishra & Meera Mishra. 2009. "Combating Corruption in India:  
Challenges and Approaches", in Gong, T. & S.K. Ma eds., Preventing Corruption in Asia:  
14 Institutional Design and Policy Capacity (London: Routledge), Dwyer, L., K. Golden & S. Lehman.  
2014. Public Corruption. American Criminal Law Review
- 15 Dye, K. 2007. "Corruption and Fraud Detection by Supreme Audit Institutions", in A. Shah  
16 ed., Performance Accountability and Combating Corruption (World Bank).
- 17 Dye, K.M. & R. Stapenhurst. 1998. Pillars of Integrity: The Importance of Supreme Audit  
18 Institutions in Curbing Corruption (Washington, D.C.: World Bank).
- 19 Dza, Mawuko, Rod Gapp & Ron Fisher. 2015. Taking the Professionalism Out of the  
20 Profession: A Study of Procurement and Africa. International Journal of Procurement Management  
8(3):.
- 21 Dzamtovska-Zdrvkovska, S., J. Denkova & A. Majhosev. 2014. Transparency v.  
22 Corruption: The Case of Republic of Macedonia. Bulgarian Journal of Science & Education  
23 Policy
- 24 Dzhumashev, Ratbek. 2014. Corruption and Growth: The Role of Governance, Public  
25 Spending, and Economic Development. Economic Modelling
- 26 Dzhumashev, Ratbek. 2014. The Two-Way Relationship Between Government Spending  
and Corruption and its Effects on Economic Growth. Contemporary Economic Policy
- 27 Ear, Sophal. 2007. does Aid Dependence Worsen Governance? International Public  
28 Management Journal



1 Earle, B.H. & A. Cava. 2014. The Penumbra of the United States' Foreign Corrupt Practices  
2 Act: Brazil's Clean Companies Act and Implications for the Pharmaceutical Industry. Richmond  
3 Journal of Global Law & Business

4 Earle, Beverly & Anita Cava. 2008. Are Anti-Corruption Efforts Paying Off? International  
5 and National Measures in the Asia-Pacific Region and Their Impact on India and Multinational  
6 Corporations. University of Hawaii Law Review

7 Earle, Beverly. 1996. The United States' Foreign Corrupt Practices Act and the OECD -  
8 Anti-Bribery Recommendations: When Moral Suasion Won't Work, Try the Money Argument.  
9 Dick. J. Int'l L.

10 Earle, Beverly. 2000. Bribery and Corruption in Eastern Europe, the Baltic States, and the  
11 Commonwealth of Independent States: What Is To Be Done? Cornell International Law Journal

12 Easterly, William & R. Levine. 1997. Africa's Growth Tragedy: Politics and Ethnic  
13 Divisions. Quarterly Journal of Economics

14 Eboe-Osuji, Chile. 2005. "Kleptocracy: A Desired Subject of International Criminal Law  
15 that Is in Dire Need of Prosecution by Universal Jurisdiction", in Evelyn A. Ankumah & Edward  
16 K. Kwakwa eds., African Perspectives on International Criminal Justice

17 Echazu, Luciana & Nuno Garoupa. 2010. Corruption and the Distortion of Law  
18 Enforcement Effort. American Law & Economics Review.

19 Echazu, Luciana & Pinaki Bose. 2008. Corruption, Centralization, and the Shadow  
20 Economy. Southern Economic Journal

21 Echazu, Luciana. 2010. Corruption and the Balance of Gender Power. Review of Law &  
22 Economics4.

23 Ecker, Alejandro, Konstantin Glinitzer & Thomas M. Meyer. 2015. Corruption Performance  
24 Voting and the Electoral Context. European Political Science Review (forthcoming).

25 Efobi, Uchenna. 2015. Politicians' Attributes and Institutional Quality in Africa: A Focus on  
26 Corruption. Journal of Economic Issues

27 Egger, Peter & Hannes Winner. 2005. Evidence on Corruption as an Incentive for Foreign  
28 Direct Investment. European Journal of Political Economy

Egger, Peter & Hannes Winner. 2007. How Corruption Influences Foreign Direct  
Investment: A Panel Data Study. Economic Development & Cultural Change

Eggers, Andrew & Arthur Spirling. 2013. Guarding the Guardians: Legislative Self-Policing  
and Electoral Corruption in Victorian Britain. Quarterly Journal of Political Science

Eggers, Andrew C. & Jens Hainmueller. 2009. MPs for Sale? Returns to Office in Postwar  
British Politics. American Political Science Review

1 Eggers, Andrew C. & Jens Hainmueller. 2013. Capitol Losses: The Mediocre Performance  
2 of Congressional Stock Portfolios. *Journal of Politics*

3 Eggers, Andrew. 2014. Partisanship and Electoral Accountability: Evidence from the UK  
4 expenses Scandal. *Quarterly Journal of Political Science*

5 Egorov, Georgy, Sergei Guriev & Konstantin Sonin. 2009. Why Resource-Poor Dictators  
6 Allow Freer Media: A Theory and Evidence from Panel Data. *American Political Science Review*

7 Ehrlich, Isaac & Francis T. Lui. 1999. Bureaucratic Corruption and Endogenous Economic  
8 Growth. *Journal of Political Economy*

9 Eicher, T., C. Garcia-Penalosa & T. Van Ypserspele. 2009. Education, Corruption, and the  
10 Distribution of Income. *Journal of Economic Growth*

11 Eigen, Peter. 2002. Measuring and Combating Corruption. *Policy Reform*

12 Eigen, Peter. 2007. Fighting Corruption in a Global Economy: Transparency Initiatives in  
13 the Oil and Gas Industry. *Houston Journal of International*

14 Einhorn, Aaron. 2007. The Evolution and Endpoint of Responsibility: The FCPA, SOX,  
15 Socialist-Oriented Governments, Gratuitous Promises, and a Novel CSR Code. *Denver Journal of*  
16 *International Law & Policy*

17 Eisler, Jacob. 2011. The Unspoken Institutional Battle Over Anticorruption: Citizens United,  
18 Honest Services, and the Legislative-Judicial Divide. *First Amendment Law Review*

19 Elbadawi, I. & R. Soto. 2012. Resource Rents, Political Economy and Economic Growth.  
20 Working paper.

21 Elbahnasawy, Nasr G. & Charles F. Revier. 2012. The Determinants of Corruption: Cross-  
22 Country-Panel-Data Analysis. *The Developing Economies*

23 Elbahnasawy, Nasr G. 2014. E-Government, Internet Adoption, and Corruption: An  
24 Empirical Investigation. *World Development*

25 Eldreidge, Tull. 2013. Without Bounds: Navigating Corporate Compliance Through  
26 Enforcement of the Foreign Corrupt Practices Act. *Arkansas Law Review*

27 Eliason, Randall D. 2009. Surgery with a Meat Axe: Using Honest Services Fraud to  
28 Prosecute Federal Corruption. *Journal of Criminal Law & Criminology*

Eliat, Y. & C. Zinnes. 2002. The Shadow Economy in Transition Countries: Friend or Foe?  
A Policy Perspective. *World Development*

Elliot, Kimberly Ann, ed. 1997. *Corruption and the Global Economy*. Washington, D.C.:  
Institute for International Economics.

Pg 1601 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Elliott, Kimberly Ann. "Corruption as an International Policy Problem: Overview and Recommendations", in Elliott, Kimberly Ann ed., Corruption and the Global Economy (Institute for International Economics)

Elliott, Kimberly Ann. 1998. The Problem of Corruption: A Tale of Two Countries. Northwestern Journal of International Law & Business

Ellis, S. 2006. The Roots of African Corruption. Current History

Emerson, Patrick M. 2002. Corruption and Industrial Dualism in Less Developed Countries. Journal of International Trade & Economic Development

Emerson, Patrick M. 2006. Corruption, Competition and Democracy. Journal of Development Economics

Enderwick, Peter. 2005. What's Bad About Crony Capitalism? Asian Business & Management

Engel, Christopher, Sebastian J. Georg & Gaoneng Yu. 2013. Symmetric vs. Asymmetric Punishment Regimes for Bribery. Working paper.

Engle, Eric. 2010. I Get By With a Little Help From My Friends? Understanding the U.K. Anti-Bribery Statute, by Reference to the OECD Convention and the Foreign Corrupt Practices Act. International Lawyer

Engvall, J. 2014. Why Are Public Offices Sold in Kyrgyzstan? Post-Soviet Affairs

Engvall, Johan. 2012. Against the Grain: How Georgia Fought Corruption and What It Means. Central Asia-Caucasus Institute & Silk Road Studies Program, Silk Road Paper.

Eniayejuni, A. & N.S. Evcan. 2015. Nigeria: Corruption Arising from Bad Leadership. European Scientific Journal

Enikolopov, Ruben & Ekaterina Zhuravskaya. 2007. Decentralization and Political Institutions. Journal of Public Economics

Enikolopov, Ruben, Maria Petrova & Konstantin Sonin. 2013. Social Media and Corruption. Working paper.

Ensor, T. 2004. Informal Payments for Health Care in Transition Economies. Social Science & Medicine.

Epperly, B. & T. Lee. 2015. Corruption and NGO Sustainability: A Panel Study of Post-Communist States. Voluntas: International Journal of Voluntary & Nonprofit Organizations

Erard, Brian & Jonathan Feinstein. 1994. Honesty and Evasion in the Tax Compliance Game. Rand Journal of Economics

Eren, T. & A. Jimenez. 2015. Institutional Quality Similarity, Corruption Distance and

1 Inward FDI in Turkey. Journal for East European Management Studies

2 Erlingsson, Gissur O., Andreas Bergh & Mats Sjölin. 2008. Public Corruption in Swedish  
3 Municipalities: Trouble Looming on the Horizon? Local Government Studies

4 Ernst, Joshua. 2011. The Dodd-Frank Whistleblower Provision: Throwing Fuel on the Fire  
5 for Foreign Corrupt Practices Act Compliance. Arizona State Law Journal.

6 Erwin, P.M. 2010. Corporate Codes of Conduct: The Effects of Code Content and Quality  
7 on Ethical Performance. Journal of Business Ethics

8 Esarey, Justin & Gina Chirillo. 2013. "Fairer Sex" or Purity Myth? Corruption, Gender, and  
9 Institutional Context. Politics & Gender.

10 Escaleras, M., N. Anbarchi & C. Register. 2007. Public Sector Corruption and Major  
11 Earthquakes: A Potentially Deadly Interaction. Public Choice

12 Escaleras, Monica, Shu Lin & Charles Register. 2010. Freedom of Information Acts and  
13 Public Sector Corruption. Public Choice

14 Escobar-Lemmon, M. & A.D. Ross. 2014. does Decentralization Improve Perceptions of  
15 Accountability? Attitudinal Evidence from Colombia. American Journal of Political Science

16 Escresa, Laarni & Lucio Picci. 2013. A New Cross-National Measure of Corruption.  
17 Working paper.

18 Eskeland, Gunnar S. & Henrik Thiele. 1999. Corruption Under Moral Hazard. World Bank  
19 Research Working Paper 2204.

20 Espinosa-Ramirez, R. 2015. Corruption, Trade, and Institutional Reforms. International  
21 Journal of Trade & Global Markets

22 Estache, A., A. Goicoechea & L. Trujillo. 2006. Utilities Reform and Corruption in  
23 Developing Countries. World Bank Policy Research Working Paper

24 Estache, Antonio & Liam Wren-Lewis. 2011. "Anti-Corruption Policy in Theories of Sector  
25 Regulation", in International Handbook on the Economics of Corruption, Vol. II. (Edward Elgar  
26 Publishing).

27 Etzioni, Amitai. 1988. Capital Corruption: The New Attack on American Democracy.

28 Everett, Jeff, D. Neu & A.S. Rahman. 2007. Accounting and the Global Fight Against  
Corruption. Accounting, Organizations & Society

Everhart, S.S., J. Martinez-Vazquez & R.M. McNab. 2009. Corruption, Governance,  
Investment and Growth in Emerging Markets. Applied Economics

Evrenk, H. 2011. Why a Clean Politician Supports Dirty Politics: A Game-Theoretical  
explanation for the Persistence of Political Corruption. Journal of Economic Behavior &

1 Organization

2 Evrensel, Ayse Y. 2009. Differences in Bank Regulation: The Role of Governance and  
3 Corruption. *Journal of Economic Policy Reform*

4 Ewoh, A.I.E., A. Matei & L. Matei. 2013. Corruption, Public Integrity, and Globalization in  
5 South-Eastern European States: A Comparative Analysis. *Theoretical & Applied Economics*

6 Faber, Gerrit & Michiel Gerritse. 2012. Foreign Determinants of Local Institutions: Spatial  
7 Dependence and Openness. *European Journal of Political Economy*

8 Fabrizi, Simona & Steffen Lippert. 2012. Corruption and Public Display of Wealth.  
9 University of Otago Economics Discussion Papers No. 1202.

10 Faccio, Mara & David C. Parsley. 2009. Sudden Deaths: Taking Stock of Geographic Ties.  
11 *Journal of Financial & Quantitative Analysis*

12 Faccio, Mara, Ronald W. Masulis & John J. McConnell. 2006. Political Connections and  
13 Corporate Bailouts. *Journal of Finance*

14 Faccio, Mara. 2006. Politically Connected Firms. *American Economic Review*

15 Fackler, Tim & Tse-min Lin. 1995. Political Corruption and Presidential Elections, 1929-  
16 1992. *Journal of Politics*

17 Factor, R. & M. Kang. 2015. Corruption and Population Health Outcomes: An Analysis of  
18 Data from 133 Countries Using Structural Equation Modeling. *International Journal of Public  
19 Health*

20 Fadairo, O. & A. Ladele. 2014. Attitudes and Perception of Corrupt Practices among Public  
21 Officials in the Agricultural Sector in Southwestern Nigeria. *Developing Country Studies*

22 Fafchamps, Marcel & Julien Labonne. 2013. Do Politicians' Relatives Get Better Jobs?  
23 Evidence from Municipal Elections in the Philippines. Working paper.

24 Fahr, R. & B. Djawadi. 2013. The Impact of Risk Perception and Risk Attitudes on Corrupt  
25 Behavior: Evidence from a Petty Corruption experiment. IZA Discussion Paper No. 738.

26 Falaschetti, Dino & Gary Miller. 2001. Constraining the Leviathan: Moral Hazard and  
27 Credible Commitment in Constitutional Design. *Journal of Theoretical Politics*

28 Falkingham, J. 2004. Poverty, Out-of-Pocket Payments and Access to Health Care:  
Evidence from Tajikistan. *Social Science & Medicine*.

Fallon, F. & B.J. Cooper. 2015. Corporate Culture and Greed—The Case of the Australian  
Wheat Board. *Australian Accounting Review*.

Fan, C. Simon, Chen Lin & Daniel Treisman. 2009. Political Decentralization and  
Corruption: Evidence from Around the World, *Journal of Public Economics*

- 1 Fan, J., F. Guan, Z. Li & Y. Yang. 2014. Relationship Networks and Earnings  
2 Informativeness: Evidence from Corruption Cases. Journal of Business Finance & Accounting
- 3 Fan, Joseph P.H., Oliver Meng Rui & Mengxin Zhao. 2008. Public Governance and  
4 Corporate Finance: Evidence from Corruption Cases. Journal of Comparative Economics
- 5 Fan, Joseph P.H., Zengquan Li & Yong George Yang. 2010. Relationship Networks and  
6 Earnings Informativeness: Evidence from Corruption Cases. Working paper.
- 7 Fanjul, Jose Armando. 2008. Corporate Corruption in Latin America: Acceptance, Bribery,  
8 Compliance, Denial, Economics, and the Foreign Corrupt Practices Act. Penn State International  
9 Law Review
- 10 Fantaye, Dawit Kiros. 2004. Fighting Corruption and Embezzlement in Third World  
11 Countries. Journal of Criminal Law
- 12 Fariello, Frank A., Jr. & Conrad C. Daly. 2013. Coordinating the Fight against Corruption  
13 among MDBs: The Past, Present, and Future of Sanctions. George Washington International Law  
14 Review
- 15 Farla, K. 2014. Determinants of Firms' Investment Behavior: A Multilevel Approach.  
16 Applied Economics
- 17 Faruq, H., M. Webb & D. Yi. 2013. Corruption, Bureaucracy and Firm Productivity in  
18 Africa. Review of Development Economics
- 19 Fasano, Dominique T. 2012. United States v. Aguilar: District Court Attempts Clarification  
20 of the Foreign Corrupt Practices Act by Further Defining "Foreign Official". Tulane Journal of  
21 International & Comparative Law
- 22 Faughman, Brian M. & Mitchell A. Seligson. 2015. "Corruption in Latin America: A View  
23 from the AmericasBarometer", in Paul M. Heywood ed., The Routledge Handbook of Political  
24 Corruption (New York: Routledge)
- 25 Fay, Christopher. 1995. Political Sleaze in France: Forms and Issues. Parliamentary Aff.
- 26 Fazekas, M. & I. Toth. 2014. From Corruption to State Capture: A New Analytical  
27 Framework with Emprical Applications from Hungary. Working paper.
- 28 Fazekas, Mihaly, Istvan Janos Toth & Lawrence Peter King. 2013. Anatomy of Grand  
Corruption: A Composite Corruption Risk Index Based on Objective Data. CRCB Working Paper.
- Fazekas, Mihaly, Jana Chvalkovska, Jiri Skuhrovec, Istvan Janos Toth & Lawrence Peter  
King. 2013. Are EU Funds a Corruption Risk? The Impact of EU Funds on Grand Corruption in  
Central and Eastern Europe. CRCB Working Paper
- Fedran, J., B. Dobovsek & B. Azman. 2015. Assessing the Preventive Anti-Corruption  
Efforts in Slovenia. Varstvoslovje

1 Feichtinger, Gustav & Franz Wirl. 1994. On the Stability and Potential Cyclicity of  
2 Corruption in Governments Subject to Popularity Constraints. Mathematical Social Sciences.

3 Feichtinger, Gustav. 2000. On the Economics of Corruption and Illicit Drugs. Applications  
4 of Mathematics and Statistics in Economy

5 Fein, E. & J. Weibler. 2014. Cognitive Basis for Corruption and Attitudes towards  
6 Corruption in Organizations Viewed from a Structuralist Adult Developmental Meta-Perspective.  
Behavioral Development Bulletin

7 Fein, E. & J. Weibler. 2014. Review and Shortcomings of Literature on Corruption in  
8 Organizations in Offering a Multi-Faceted and Integrative Understanding of the Phenomenon.  
Behavioral Development Bulletin

9 Feliciano, Florention P. 2012. Random Reflections on the Bar, Corruption and the Practice  
10 of Law. Philippine Law Journal

11 Fell, Dafydd. 2005. Political and Media Liberalization and Political Corruption in Taiwan.  
12 China Quarterly

13 Felson, Marcus. 2012. "Corruption in the Broad Sweep of History", in Adam Graycar &  
14 Russell G. Smith eds., Handbook of Global Research and Practice in Corruption ,

15 Fendo, Julie. 2000. Attacking the Tools of Corruption: The Foreign Money Laundering  
Deterrence and Anticorruption Act of 1999. Fordham International Law Journal 23: 1540-1576.

16 Fernandez-Vazquez, Pablo, Pablo Barbera & Gonzalo Rivero. 2013. Rooting Out  
17 Corruption or Rooting For Corruption? The Heterogeneous Electoral Consequences of Scandals.  
Working paper.

18 Ferraz, Claudio & Frederico Finan. 2008. exposing Corrupt Politicians: The Effects of  
19 Brazil's Publicly Released Audits on Electoral Outcomes. Quarterly Journal of Economics

20 Ferraz, Claudio & Frederico Finan. 2010. Motivating Politicians: The Impact of Monetary  
21 Incentives on Quality and Performance. (Working paper)

22 Ferraz, Claudio & Frederico Finan. 2011. Electoral Accountability and Corruption:  
23 Evidence from the Audits of Local Governments. American Economic Review

24 Ferraz, Claudio, Frederico Finan & Diana B. Moreira. 2012. Corrupting Learning: Evidence  
from Missing Federal Education Funds in Brazil. Journal of Public Economics

25 Ferreras, Leticia. 2013. Corruption and Foreign Education. Journal of Politics & Society  
26

27 Ferreyra-Orozco, Gabriel. 2010. Understanding Corruption in a State Supreme Court in  
Mexico: An Ethnographic Approach. Human Organization

28 Field Jr., Alfred, Luis A. Sosa & Xiaodong Wu. 2006. Effects of Endogenous Bribes on



Foreign Direct Investment. Working paper.

Figueroa, J.R. 2012. Justice System Institutions and Corruption Control: Evidence from Latin America. *Justice Systems Journal*

Finan, Frederico & Laura Schechter. 2012. Vote Buying and Reciprocity. *Econometrica*.

Findley, Michael G., Daniel L. Nielson & Jason Sharman. 2015. Causes of Noncompliance with International Law: A Field experiment on Anonymous Incorporation. *American Journal of Political Science*

Findley, Michael, Daniel Nielson & Jascon C. Sharman. 2013. Using Field experiments in International Relations: A Randomized Study on Anonymous Incorporation. *International Organization*

Findley, Michael, Daniel Nielson & Jason Sharman. 2014. *Global Shell Games: experiments in Transnational Relations, Crime, and Terrorism* (Cambridge: Cambridge University Press).

Finnie, B.W., L. Gibson & D. McNabb. 2006. Economic Development: Corruption, Complexity, Wealth, and a Triad of Strains. *Humanomics*

Fiodendji, K. & K. Evlo. 2015. Do Institutions' Quality Affect FDI Inflows in Sub-Saharan African Countries? *Journal of Applied Finance & Banking*

Fiorino, N., E. Galli & F. Padovano. 2015. How Long does It Take for Government Decentralization to Affect Corruption? *Economics of Governance*

Fiorino, Nadia, Emma Galli & Fabio Padovano. 2013. "Do Fiscal Decentralization and Government Fragmentation Affect Corruption in Different Ways? Evidence from a Panel Data Analysis", in S. Lago-Penas & J. Martinez-Vazquez eds., *The Challenge of Local Government Size: Theoretical Perspectives, International experience and Policy Reform* - Cheltenham, U.K.

Fiorino, Nadia, Emma Galli & Ilaria Petrarca. 2012. Corruption and Growth: Evidence from the Italian Regions. *European Journal of Government & Economics*

Firger, Daniel M. 2012. Transparency and the Natural Resource Curse: Examining the New Extraterritorial Information Forcing Rules in the Dodd-Frank Wall Street Reform Act of 2010. *Georgetown International Law Journal*

Fischer, Ronald, Marioa Cristina Ferreira, Taciano Milfont & Ronaldo Pilati. 2014.

Culture of Corruption? The Effects of Priming Corruption Images in a High Corruption Context. *Journal of Cross-Cultural Psychology*

Fisher, Elizabeth. 2010. Transparency and Administrative Law: A Critical Evaluation. *Current Legal Problems*

Fisman, R. & R. Gatti. 2006. Bargaining for Bribes: The Role of Institutions. Discussion Paper 5712, Center for Economic Policy and Research.



- 1 Fisman, Raymond & Edward Miguel. 2007. Corruption, Norms, and Legal Enforcement:  
2 Evidence from Diplomatic Parking Tickets. Journal of Political Economy  
3  
4 Fisman, Raymond & Edward Miguel. 2008. Economic Gangsters: Corruption, Violence, and  
5 the Poverty of Nations. Princeton University Press  
6  
7 Fisman, Raymond & Roberta Gatti. 2002a. Decentralization and Corruption: Evidence from  
8 U.S. Federal Transfer Programs.  
9  
10 Fisman, Raymond & Roberta Gatti. 2002b. Decentralization and Corruption: Evidence  
11 Across Countries. Journal of Public Economic  
12  
13 Fisman, Raymond & Shang-Jin Wei. 2009. The Smuggling of Art, and the Art of  
14 Smuggling: Uncovering the Illicit Trade in Cultural Property and Antiques. American Economic  
15 Journal: Applied Economics.  
16  
17 Fisman, Raymond & Wei, Shang-Jin. 2004. Tax Rates and Tax Evasion: Evidence from  
18 'Missing Imports' in China. Journal of Political Economy  
19  
20 Fisman, Raymond & Yongxiang Wang. 2013. The Mortality Cost of Political Connections.  
21 Working paper.  
22  
23 Fisman, Raymond & Yongxiang Wang. 2015. Corruption in Chinese Privatizations. Journal  
24 of Law, Economics & Organization  
25  
26 Fisman, Raymond J. & Jakob Svensson. 2007. Are Corruption and Taxation Really Harmful  
27 to Growth? Firm Level Evidence. Journal of Development Economics  
28  
29 Fisman, Raymond J., David Fisman, Julia Galef, Rakesh Khurana & Yongxiang Wang.  
30 2012. Estimating the Value of Connections to Vice President Cheney. B.E. Journal of Economic  
31 Analysis & Policy, Advances.  
32  
33 Fisman, Raymond, Florian Schulz & Vikrant Vig. 2014. The Private Returns to Public  
34 Office. Journal of Political Economy.  
35  
36 Fisman, Raymond. 2001. Estimating the Value of Political Connections. Am. Econ.  
37  
38 Fisman, Raymond. 2015. "Political Connections and Commerce – A Global Perspective", in  
39 Susan Rose-Ackerman & Paul Lagunes eds., Greed, Corruption, and the Modern State  
40  
41 Fitzsimons, Vincent G. 2007. "Economic Models of Corruption", in Sarah Bracking ed.,  
42 Corruption and Development: The Anti-Corruption Campaigns (Palgrave Macmillan).  
43  
44 Fjelde, H. & H. Hegre. 2014. Political Corruption and Institutional Instability. Studies in  
45 Comparative Institutional Development  
46  
47 Fjelde, H. 2006. Buying Peace? Oil Wealth, Corruption and Civil War 1984-1999. (Working

paper).

Fjeldstad, Odd-Helge & Bertil Tungodden. 2003. Fiscal Corruption: A Vice or Virtue?: A Reply. World Development

Fjeldstad, Odd-Helge & Bertil Tungodden. 2003. Fiscal Corruption: A Vice or Virtue? World Development

Fjeldstad, Odd-Helge & Jan Isaksen. 2008. Anti-Corruption Reforms: Challenges, Effects and Limits of World Bank Support. (Washington, D.C. World Bank IEG Working Paper no. 7)

Fjeldstad, Odd-Helge, Ivar Kolstad & Knut Nygaard. 2006. Bribes, Taxes and Regulations: Business Constraints for Micro Enterprises in Tanzania. (Bergen: Chr. Michelsen Institute, CMI Working Paper WP 2006: 2)

Fjeldstad, Odd-Helge. 2001. Taxation, Coercion and Donors: Local Government Tax Enforcement in Tanzania. Journal of Modern African Studies

Fjeldstad, Odd-Helge. 2003. Fighting Fiscal Corruption: Lessons from the Tanzania Revenue Authority. Public Administration and Development

Fjeldstad, Odd-Helge. 2006. "Corruption in Tax Administration: Lessons from Institutional Reforms in Uganda" in Susan Rose-Ackerman ed. International Handbook on the Economics of Corruption

Fjeldstad, Odd-Helge. 2009. The Pursuit of Integrity in Customs: experiences from Sub-Saharan Africa. (Bergen: Chr. Michelsen Institute, CMI Working Paper WP 2009: 8) Flatters, Frank & W. Bentley MacLeod. 1995. Administrative Corruption and Taxation. International Tax and Public Finance

Fleischer, David. 1997. Political Corruption in Brazil: The Delicate Connection with Campaign Finance. Crime, Law & Social Change .

Fletcher, Claire & Daniela Herrmann. 2012. The Internationalisation of Corruption. Farnham: Ashgate.

Flyvbjerg, Bent & Eamonn Molloy. 2011. "Delusion, Deception and Corruption in Major Infrastructure Projects: Causes, Consequences and Cures", in International Handbook on the Economics of Corruption, Vol. II. (Edward Elgar Publishing).

Foellmi, R. & M. Oeschlin. 2007. Who Gains from Non-Collusive Corruption? Journal of Development Economics.

Fogel, K. 2006. Oligarchic Family Control, Social Economic Outcomes, and the Quality of Government. Journal of International Business Studies

Foley, Veronica & Catina Haynes. 2009. The FCPA and its Impact in Latin America. Currents: International Trade Law Journal

- 1 Folke, Olle, Shigeo Hirano & James M. Snyder, Jr.. 2011. Patronage and Elections in US
- 2 States. American Political Science Review
- 3
- 4 Follett, G. 2015. Facilitating Payments: Facilitating Poverty? Alternative Law Journal
- 5
- 6 Folliot-Lalliot, Laurence. 2014. "Introduction to the World Bank's Policies in the Fight
- 7 Against Corruption and Conflicts of Interest in Public Contacts", in Jean-Bernard Auby, Emmanuel
- 8 Breen & Thomas Perroud eds., Corruption and Conflicts of Interest: A Comparative Law Approach
- 9
- 10 Foltz, J.D. & D.W. Bromley. 2012. Highway Robbery: The Economics of Petty Corruption
- 11 in West African Trucking. Working paper.
- 12
- 13 Fombad, Charles Manga. 1999. Curbing Corruption in Africa: Some Lessons from
- 14 Botswana's experience. International Social Science Journal
- 15
- 16 Fontana, A. & P. Gomes Pereira. 2012. Using Money Laundering Investigations to Fight
- 17 Corruption in Developing Countries: Domestic Obstacles and Strategies to Overcome Them. U4
- 18 Issue Brief 2012:9 (Bergen: CMI).
- 19
- 20 Ford, Cristie & David Hess. 2009. Can Corporate Monitorships Improve Corporate
- 21 Compliance? Journal of Corporation Law
- 22
- 23 Ford, Cristie L. & David Hess. 2011. Corporate Monitorships and New Governance
- 24 Regulation: In Theory, In Practice, and In Its Regulatory Context. Law & Policy
- 25
- 26 Forrest, David & Wolfgang Maennig. 2015. "The Threat to Sports Governance from Betting-
- 27 Related Corruption: Causes and Solution" , in Paul M. Heywood ed., The Routledge Handbook of
- 28 Political Corruption (New York: Routledge)
- Fort, Timothy L. & James J. Noone. 2000. Gifts, Bribes, and Exchange: Relationships in
- Non-Market Economies and Lessons for Pax E-Commercia. Cornell International Law Journal
- Fortin-Rittberger, J. 2014. The Role of Infrastructural and Coercive State Capacity in
- explaining Different Types of Electoral Fraud. Democratization
- Fox, J. 1994. The Difficult Transition from Clientalism to Citizenship: Lessons from
- Mexico. World Politics
- Fox, Jonathan. 2007. The Uncertain Relationship Between Transparency and
- Accountability. Development in Practice
- Fox, William. 2009. Adjudicating Bribery and Corruption Issues in International
- Commercial Arbitration. Journal of Energy & Natural Resources Law 27(3): 487-502.
- Francken, Nathalie, Bart Minten & Johan F.M. Swinnen. 2009. Media, Monitoring, and
- Capture of Public Funds: Evidence from Madagascar. World Development
- Frank, Bjorn & Gunther G. Schulze. 2000. does Economics Make Citizens Corrupt? Journal
- of Economic Behavior & Organization

1 Frank, Bjorn, Johann Graf Lambsdorff & Frederic Boehm. 2011. Gender and Corruption:  
2 Lessons from Laboratory Corruption experiments. European Journal of Development Research

3 Frankel, Jeffrey. 2012. "The Natural Resource Curse: A Survey of Diagnoses and Some  
4 Prescriptions", in Rabah Arezki & Zhu Min eds., Commodity Price Volatility and Inclusive Growth  
in Low-Income Countries (Washington, D.C. : International Monetary Fund).

5 Franklin, Aaron. 2010. Targeted Tariff Preferences to Reduce Corruption in Developing  
6 States. Georgetown Journal of International Law

7 Fraser, Stephen A. 2012. Placing the Foreign Corrupt Practices Act on the Tracks in the  
8 Race for Amnesty. Texas Law Review

9 Frechette, Guillaume R. 2006. Panel Data Analysis of the Time-Varying Determinants of  
10 Corruption. CIRANO Working Paper

11 Frederickson, H. George & David G. Frederickson. 1995. Public Perceptions of Ethics in  
Government. Annals of the American Academy of Political and Social Science

12 Fredriksson, A. 2014. Bureaucracy Intermediaries, Corruption and Red Tape. Journal of  
13 Development Economics

14 Fredriksson, P.G. & D.L. Millimet. 2007. Legislative Organization and Pollution Taxation.  
15 Public Choice .

16 Fredriksson, P.G., E. Neumayer & G. Ujhelyi. 2007. Kyoto Protocol Cooperation: does  
Government Corruption Facilitate Environmental Lobbying? Public Choice

17 Fredriksson, P.G., H.R.J. Vollebergh & E. Dijkgraaf. 2004. Corruption and Energy  
18 Efficiency in OECD Countries: Theory and Evidence. Journal of Environmental Economics &  
19 Management

20 Fredriksson, Per G. & Herman R. J. Vollebergh. 2009. Corruption, Federalism, and Policy  
Formation in the OECD: The Case of Energy Policy. Public Choice

21 Fredriksson, Per G. & Jakob Svensson. 2003. Political Instability, Corruption and Policy  
22 Formation: The Case of Environmental Policy. Journal of Public Economic

23 Fredriksson, Per G. et al. 2003. Bureaucratic Corruption, Environmental Policy and Inbound  
24 US FDI: Theory and Evidence. Journal of Public Economics

25 Freille, Sebastian, M. Emranul Haque & Richard Kneller. 2007. A Contribution to the  
26 Empirics of Press Freedom and Corruption. European Journal of Political Economy

27 Freille, Sebastian, M. Emranul Haque & Richard Kneller. 2008. Federalism,  
Decentralization, and Corruption. (working paper)

28 Freund, Caroline, Mary Hallward-Driemeier & Bob Rijkers. 2013. Predictably Protracted:

1 Firm-Level Evidence on Corruption and Policy Implementation Time. Working paper.

2 Fried, Brian J., Paul Lagunes & Atheendar Venkataramani. 2010. Corruption and Inequality  
3 at the Crossroad: A Multimethod Study of Bribery and Discrimination in Latin America. Latin  
American Research Review

4 Friedman, Eric et al. 2000. Dodging the Grabbing Hand: The Determinants of Unofficial  
5 Activity in 69 Countries. Journal of Public Economics

6 Friedrich, Carl J. 1972. "Corruption Concepts in Historical Perspective," in Heidenheimer,  
7 Johnson & LeVine eds. Political Corruption: A Handbook.

8 Frischmann, Eva. 2010. Decentralization and Corruption: A Cross-Country Analysis.

9 Fritz, Verena. 2007. Democratisation and Corruption in Mongolia. Public Administration &  
10 Development

11 Fritzen, S. 2005. Beyond "Political Will": How Institutional Context Shapes the  
12 Implementation of Anti-Corruption Policies. Policy & Society

13 Fritzen, S.A., S. Serritzlew & G.T. Svendsen. 2014. Corruption, Trust and Their Public  
14 Sector Consequences: Introduction to the Special Issue. Journal of Comparative Policy Analysis:  
Research & Practice

15 Fritzen, Scott A. & Shreya Basu. 2012. "From Information to Indicators: Monitoring  
16 Progress in the Fight Against Corruption in Multi-Project, Multi-Stakeholder Organizations", in  
Adam Graycar & Russell G. Smith eds., Handbook of Global Research and Practice in Corruption

17 Froomkin, Saul M. 2004. Money Laundering, Corruption, and the Proceeds of Crime — An  
18 International Reality Check. Asper Review of International Business & Trade Law

19 Frost, J. & S. Tischer. 2014. Unmasking Collective Corruption: The Dynamics of Corrupt  
Routines. European Management Review

20 Frye, T. & E. Zhuravskaya. 2000. Rackets, Regulation and the Rule of Law. Journal of Law,  
21 Economics & Organization.

22 Frye, T. 2002. Capture or Exchange? Business Lobbying in Russia. Europe-Asia Studies

23 Frye, T., O.J. Reuter & D. Szakonyi. 2014. Political Machines at Work: Voter Mobilization  
24 and Electoral Subversion in the Workplace. World Politics

25 Fu, Hualing. 2014. Drawing the Sword: Xi's New Anti-Corruption Campaign. Working  
26 paper.

27 Fu, Hualing. 2015. "Wielding the Sword: President Xi's New Anti-Corruption Campaign",  
in Susan Rose-Ackerman & Paul Lagunes eds., Greed, Corruption, and the Modern State

28 Fujiwara, Thomas & Leonard Wantchekon. 2013. Can Informed Public Deliberation

1 Overcome Clientalism? experimental Evidence from Benin. American Economic Journal: Applied  
2 Economics

3 Fukumi, A. & S. Nishijima. 2010. Institutional Quality and Foreign Direct Investment in  
4 Latin America and the Caribbean. Applied Economics

5 Funaki, Y. & B. Glencorse. 2014. Anti-Corruption or Accountability? International Efforts  
6 in Post-Conflict Liberia. Third World Quarterly

7 Funderburk, Charles. 2012. Political Corruption in Comparative Perspective. Farnham:  
8 Ashgate.

9 Fungacova, Z., A. Kochanova & L. Weill. 2015. does Money Buy Credit? Firm-Level  
10 Evidence on Bribery and Bank Debt. World Development

11 Funk, C.L. 1996. The Impact of Scandal on Candidate Evaluations: An experimental Test of  
12 the Role of Candidate Traits. Political Behavior

13 Fursova, V. & G. Simons. 2014. Social Problems of Modern Russian Higher Education: The  
14 Example of Corruption. International Education Studies

15 Gaballand, Gael & Jean Francois Marteau. 2013. "Rents Extraction in the Sub-Saharan  
16 Africa Port Sector", in Soreide, Tina & Aled Willams eds., Corruption, Grabbing and  
17 Development .

18 Gadowska, Kaja. 2010. National and International Anti-Corruption Efforts: The Case of  
19 Poland. Global Crime.

20 Gaivoronskaya, Y. & T. Filonenko. 2014. Issues of Applying Anti-Corruption Legislation in  
21 Criminal Investigation and Court Trial in the Russian Federation. Asian Social Science

22 Gaivoronskaya, Y. & T. Filonenko. 2015. Corruption in Russia: Cause and Effect Relations.  
23 Asian Social Science

24 Galang, R.M.N. 2012. Victim or Victimizer: Firm Responses to Government Corruption.  
25 Jorunal of Management Studies

26 Galeotti, G. & A. Merlo. 1994. Political Collusion and Corruption in a Representative  
27 Democracy. Public Finance

28 Galinato, G. & S. Galinato. 2010. The Effects of Corruption Control and Political Stability  
on the Environmental Kuznets Curve of Deforestation-Induced Carbon Dioxide Emissions.  
Working paper.

Gallego, Jorge. 2015. Self-Enforcing Clientalism. Journal of Theoretical Politics

Galtung, Fredrik. 1998. Criteria for Sustainable Corruption Control. European Journal of  
Development Research

- 1 Galtung, Fredrik. 2005. "Measuring the Immeasurable: Boundaries and Functions of  
2 (Macro) Corruption Indices," in C. Sampford et al. eds., Measuring Corruption (London: Ashgate)
- 3 Gambetta, Diego. "Corruption: An Analytical Map", in S. Kotkin & A. Sajo eds., Political  
4 Corruption in Transition: A Sceptic's Handbook (Budapest: Central European University Press).
- 5 Gamboa-Cavazos, Mario, Vidal Garza-Cantu & Carlos E. Salinas. 2007. The Organization  
6 of Corruption: Political Horizons and Special Interests. Working paper.
- 7 Gani, Azmat & Michael D. Clemes. 2015. Natural Resource exports and Corruption.  
8 International Advances in Economic Research
- 9 Gans-Morse, Jordan, Sebastian Mazzuca & Simeon Nichter. 2014. Varieties of Clientalism:  
10 Machine Politics during Elections. American Journal of Political Science
- 11 Gantz, David A. 1997. The Foreign Corrupt Practices Act: Professional and Ethical  
12 Challenges for Lawyers. Ariz. J. Int'l & Comp. L.
- 13 Gantz, David A. 1998. Globalizing Sanctions Against Foreign Bribery: The Emergence of a  
14 New International Legal Consensus. Nw. J. Int'l L. & Bus.
- 15 Ganuza, J.J. & E. Hauk. 2004. Economic Integration and Corruption. International Journal  
16 of Industrial Organization
- 17 Gao, L. & J. Stanyer. 2014. Hunting Corrupt Officials Online: The Human Flesh Search  
18 Engine and the Search for Justice in China. Information, Communication & Society
- 19 Gao, Q., Q. Ying & D. Luo. 2015. Hidden Income and Occupational Background: Evidence  
20 from Guangzhou. Journal of Contemporary China
- 21 Garcia, Judit. 2014. The Effects and Corruption on Seigniorage on Growth and Inflation.  
22 Working paper.
- 23 Garcia-Murillo, M. 2010. The Effect of Internet Access on Government Corruption.  
24 Electronic Government
- 25 Garcia-Quesada, M., F. Jimenez & M. Villoria. 2015. Can't Control/Won't Control:  
26 Opportunities and Deterrents for Local Urban Corruption in Lanzarote. Crime, Law & Social  
27 Change
- 28 Garcia-Rodriguez, J.L., F.J. Garcia-Rodriguez, C. Castilla-Gutierrez & S.A. Major. 2015.  
Oil, Power, and Poverty in Angola. African Studies Review
- Gardiner, John A. 1993. Defining Corruption. Corruption & Reform
- Garimella, Sai Ramani. 2014. Normative Structure for Criminalising Corruption – The  
South Asian experience. International Journal of Human Rights & Constitutional Studies



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1 Garmaev, Y., D. Stepanenko & R. Stepanenko. 2015. Judgments of the European Court of  
2 Human Rights as a Source of Recommendations on Fight Against Corruption: Prospects for  
Interdisciplinary Research. Asian Social Science

3 Garmaise, Mark J. & Jun Liu. 2005. Corruption, Firm Governance, and the Cost of Capital.  
4 Working paper.

5 Garment, Suzanne. 1991. Scandal: The Culture of Mistrust in American Politics.

6 Garoupa, Nuno & Daniel Klerman. 2004. Corruption and the Optimal Use of Nonmonetary  
7 Sanctions. International Review of Law & Economics

8 Garoupa, Nuno & Daniel M. Klerman. 2010. Corruption and Private Law Enforcement:  
9 Theory and History. Review of Law & Economic

10 Garoupa, Nuno & Mohamed Jellal. 2007. Further Notes on Information, Corruption, and  
Optimal Law Enforcement. European Journal of Law and Economics

11 Garoupa, Nuno. 1999. Dishonesty and Libel Law: The Economics of the “Chilling” Effect.  
12 Journal of Institutional & Theoretical Economics

13 Garoupa, Nuno. 1999. The Economics of Political Dishonesty and Defamation. International  
14 Review of Law & Economics

15 Garrett, Brandon L. 2007. Structural Reform Prosecution. Virginia Law Review

16 Garrett, Brandon L. 2011. Globalized Corporate Prosecutions. Virginia Law Review

17 Gastanga, V.M., J.B. Nugent & B. Pashamova. 1998. Host Country Reforms and FDI  
18 Inflows: How Much Difference Do They Make? World Development

19 Gathii, James Thuo. 1999. Corruption and Donor Reforms: expanding the Promises and  
20 Possibilities of the Rule of Law as an Anti-Corruption Strategy in Kenya. Connecticut Journal of  
International Law

21 Gathii, James Thuo. 1999. Good Governance as a Counter Insurgency Agenda to  
22 Oppositional and Transformative Social Projects in International Law. Buffalo Human Rights Law  
Review

23 Gathii, James Thuo. 2009. Defining the Relationship between Corruption and Human  
24 Rights. University of Pennsylvania Journal of International Law

25 Gatti, Roberta, Stefano Paternostro & Jamele Rigolini. 2003. Individual Attitudes Toward  
26 Corruption: Do Social Effects Matter? World Bank Policy Research Working Paper No. 3122.

27 Gatti, Roberta. 1999. Corruption and Trade Tariffs, or a Case for Uniform Tariffs. World  
Bank Policy Research Working Paper 2216.

28 Gatti, Roberta. 2004. explaining Corruption: Are Open Countries Less Corrupt? Journal of



International Development

Gauthier, Bernard & Albert Zeufack. 2012. “Cameroon’s Oil Wealth: Transparency Matters!”, in B. Akitoby & S. Coorey eds., *Oil Wealth in Central Africa: Policies for Inclusive Growth* (Washington, D.C.: International Monetary Fund)

Gauthier, Bernard & Jonathan Goyette. 2014. Taxation and Corruption: Theory and Firm-Level Evidence from Uganda. *Applied Economics* 46(23):

Gauthier, Bernard & Jonathan Goyette. 2015. Fiscal Policy and Corruption. *Social Choice & Welfare* (forthcoming).

Gauthier, Bernard & Mark Gersovitz. 1997. Revenue Erosion Through Exemption and Evasion in Cameroon. *Journal of Public Economics*

Gauthier, Bernard & Ritva Reinikka. 2006. Shifting Tax Burdens through Evasion and Exemptions: An Empirical Investigation of Uganda. *Journal of African Economics*

Gauthier, Bernard & Waly Wane. 2008. Leakage of Public Resources in the Health Sector: An Empirical Investigation of Chad. *Journal of African Economics*

Gaventa, J. & R. McGee. 2013. The Impact of Transparency and Accountability Initiatives. *Development Policy Review*

Gaviria, Alejandro. 2002. Assessing the Effects of Corruption and Crime on Firm Performance: Evidence from Latin America. *Emerging Markets Review*

Gawey, John S. 2011. The Hobbs Leviathan: The Dangerous Breadth of the Hobbs Act and Other Corruption Statutes. *Notre Dame Law Review*

Gayed, Jeremy N. 2003. “Corruptly”: Why Corrupt State of Mind Is an Essential Element for Hobbs Act Extortion Under Color of Official Right. *Notre Dame Law Review*

Gberie, Lansana. 2002. War and Peace in Sierra Leone: Diamonds, Corruption and the Lebanese Connection. Working paper.

Gebel, A.C. 2012. Human Nature and Morality in the Anti-Corruption Discourse of Transparency International. *Public Administration & Development*

Gebeye, Berihun Adugna. 2011. *Rethinking International Anti-Corruption Conventions* (Lambert Academic Publishing).

Gebeye, Berihun Adugna. 2012. Corruption and Human Rights: exploring the Relationships. Working Paper.

Geddes, Barbara & Artur Ribeiro Neto. 1992. Institutional Sources of Corruption in Brazil. *Third World Quarterly*

Geddes, Barbara. 1991. A Game-Theoretic Model of Reform in Latin American

1 Democracies. American Political Science Review

2 Gehlbach, S. & A. Simpson. 2015. Electoral Manipulation as Bureaucratic Control.  
3 American Journal of Political Science.

4 Genaux, Maryvonne. 2004. Social Sciences and the Evolving Concept of Corruption. Crime,  
5 Law & Social Change

6 Geng, H. & H. Hennig-Schmidt. 2011. Sensitivity to Corruption: An experimental  
7 Investigation in China. Working paper.

8 Gentzkow, Matthew, Edward L. Glaeser & Claudia Goldin. 2006. "The Rise of the Fourth  
9 Estate: How Newspapers Became Informative and Why It Mattered", in Edward L. Glaeser &  
10 Claudia Goldin eds., Corruption and Reform: Lessons from America's Economic History (Chicago:  
11 University of Chicago Press)

12 Georgarakos, D. & S. Furth. 2015. Household Repayment Behavior: The Role of Social  
13 Capital and Institutional, Political, and Religious Beliefs. European Journal of Political Economy

14 George, Barbara Crutchfield & Kathleen A. Lacey. 2000. A Coalition of Industrialized  
15 Nations, Developing Nations, Multilateral Development Banks, and Non-Governmental  
16 Organizations: A Pivotal Complement to Current Anti-Corruption Initiatives. Cornell International  
17 Law Journal

18 George, Barbara Crutchfield & Kathleen A. Lacey. 2006. Investigation of Halliburton  
19 Co./TSKJ's Nigerian Business Practices: Model for Analysis of the Current Anti-Corruption  
20 Environment on Foreign Corrupt Practices Act Enforcement. Journal of Criminal Law &  
21 Criminology

22 George, Barbara Crutchfield et al. 1999. On the Threshold of the Adoption of Global  
23 Antibribery Legislation: A Critical Analysis of Current Domestic and International Efforts Toward  
24 the Reduction of Business Corruption. Vand. J. Transnat'l L. .

25 George, Barbara Crutchfield, Kathleen A. Lacey & Jutta Birmele. 2000. The 1998 OECD  
26 Convention: An Impetus for Worldwide Changes in Attitudes Toward Corruption in Business  
27 Transactions. American Business Law Journal

28 George, Bruce & Simon Kimber. 2015. Reflections on Election Fraud and Its Persistence in  
Modern Democracy. American Anti-Corruption Institute White Paper.

Georgis, Pete J. 2012. Settling with Your Hands Tied: Why Judicial Intervention Is Needed  
to Curb an expanding Interpretation of the Foreign Corrupt Practices Act. Golden Gate University  
Law Review

Gephart, Malte. 2012. Contested Meanings of Corruption: International and Local  
Narratives in the Case of Paraguay. Working paper.

Gephart, Malte. 2013. Convergence, Divergence and a Complex Interplay: Chile and the  
International and Transnational Anti-Corruption Campaign. Working paper.

- 1 Gerardino, Maria Paula, Stephan Litschig & Dina D. Pomeranz. 2014. Monitoring Public  
2 Procurement: Evidence from a Regression Discontinuity Design in Chile. Working paper.
- 3 Gerring, John & Strom C. Thacker. 2004. Political Institutions and Corruption: The Role of  
4 Unitarism and Parliamentarism. British Journal of Political Science 34: 295-330.
- 5 Gerring, John & Strom C. Thacker. 2005. Do Neoliberal Policies Deter Political Corruption?  
6 International Organization
- 7 Gest, Nethaniel & Alexandru Grigorescu. 2009. Interactions among Intergovernmental  
8 Organizations in the Anti-Corruption Realm. Review of International Organizations
- 9 Getz, Kathleen A. & R.J. Volkema. 2001. Culture, Perceived Corruption, and Economics.  
10 Business & Society
- 11 Getz, Kathleen A. 2006. The Effectiveness of Global Prohibition Regimes: Corruption and  
12 the Antibribery Convention. Business & Society
- 13 Gevurtz, Franklin A. 1987. Commercial Bribery and the Sherman Act: The Case for Per Se  
14 Illegality. U. Miami L. Rev.
- 15 Gevurtz, Franklin A. 1987. Using the Antitrust Laws to Combat Overseas Bribery by  
16 Foreign Companies: A Step to Even the Odds in International Trade. Virginia Journal of  
17 International Law
- 18 Ghalwash, T. 2014. Corruption and Economic Growth: Evidence from Egypt. Modern  
19 Economy
- 20 Ghazanfar, S.M. & Karen S. May. 2000. Third World Corruption: A Brief Survey of the  
21 Issues. Journal of Social, Political & Economic Studies
- 22 Ghosh, Sugata & Andros Gregoriou. 2010. Can Corruption Favour Growth via the  
23 Composition of Government Spending? Economics Bulletin
- 24 Ghosh, Sugata & Jaideep Roy. 2009. Motivation, expertise, and Bureaucratic  
25 Embezzlement: Is There a Link? Working paper.
- 26 Ghosh, Sugata & Kyriakos C. Neanidis. 2013. Corruption, Fiscal Policy, and Growth: A  
27 Unified Approach. Working paper.
- 28 Ghura, Dhaneshwar. 1998. Tax Revenue in Sub-Saharan Africa: Effects of Economic  
Policies and Corruption. IMF Working Paper No. 98/135.
- Giannoccolo, P. & M. Lisciandra. 2014. Political Corruption and Minority Capture.  
Working paper.
- Giavazzi, Francesco & Guido Tabellini. 2005. Economic and Political Liberalizations.  
Journal of Monetary Economics.

Gibelman, Margaret & Sheldon R. Gelman. 2004. A Loss of Credibility: Patterns of Wrongdoing Among Non-Governmental Organizations. *Voluntas*

Giglioli, Pier Paolo. 1996. Political Corruption and the Media: The Tangentopoli Affair. *International Social Science Journal*

Gilbert, Michael D. & Benjamin F. Aiken. 2014. Disclosure and Corruption. *Election Law Journal* (forthcoming).

Giliomee, H. 1998. South Africa's Emerging Dominant Party Regime. *Journal of Democracy*

Gillanders, R. 2014. Corruption and Infrastructure at the Country and Regional Level. *Journal of Development Studies*

Gillespie, Kate & Gwenn Okruhlik. 1991. The Political Dimensions of Corruption Cleanups: A Framework for Analysis. *Comparative Politics*

Gillespie, Kate. 1997. Middle East Responses to the U.S. Foreign Corrupt Practices Act. *Cal. Mgmt.*

Gilson, L. 1997. The Lessons of the User Fee experience in Africa. *Health Policy & Planning*

Gingerich, Daneil W. 2009a. Corruption and Political Decay: Evidence from Bolivia. *Quarterly Journal of Political Science*.

Gingerich, Daniel W. 2009b. Ballot Structure, Political Corruption, and the Performance of Proportional Representation. *Journal of Theoretical Politics*

Gingerich, Daniel W. 2014. Yesterday's Heroes, Today's Villains: Ideology, Corruption, and Democratic Performance. *Journal of Theoretical Politics*

Gino, Francesca & Joshua D. Margolis. 2011. Bringing Ethincs Into Focus: How Regulatory Focus and Risk Preferences Influence (Un)ethical Behavior. *Organizational Behavior & Human Decision Processes*

Gino, Francesca & Lamar Pierce. 2009. The Abundance Effect: Unethical Behavior in the Presence of Wealth. *Organizational Behavior & Human Decision Processes*

Gino, Francesca & Max H. Bazerman. 2009. When Misconduct Goes Unnoticed: The Acceptability of Gradual Erosion in Others' Ethical Behavior. *Journal of experimental Social Psychology*.

Gino, Francesca, Jun Gu & Chen-Bo Zhong. 2009. Contagion or Restitution? When Bad Applies Can Motivate Ethical Behavior. *Journal of experimental Social Psychology*

Gino, Francesca, Shahar Ayal & Dan Ariely. 2009. Contagion and Differentiation in

Unethical Behavior: The Effect of One Bad Apple on the Barrel. Psychological Science

Giovannoni, Francesco & Daniel J. Seidmann. 2014. Corruption and Power in Democracies. Social Choice & Welfare

Giraudo, John P. 2005. Charitable Contributions and the FCPA: Schering-Plough and the Increasing Scope of SEC Enforcement. Business Lawyer

Giudice, Lauren. 2011. Regulating Corruption: Analyzing Uncertainty in Current Foreign Corrupt Practices Act Enforcement. Boston University Law Review

Givant, Norman. 1994. The Sword that Shields: The US Foreign Corrupt Practices Act Can Protect US Firms Doing Business in China. China Business Review (May-June) 29.

Glaeser, Edward L. & Claudia Goldin. 2006. Corruption and Reform: Lessons from America's Economic History. University of Chicago Press.

Glaeser, Edward L. & Raven E. Saks. 2006. Corruption in America. Journal of Public Economics

Glaeser, Edward L. 2004. Public Ownership in the American City, in A.E. Schwartz ed., Urban Issues and Public Finance (Northampton, MA: Edward Elgar)

Glaeser, Edward L., Rafael LaPorta, Florencio Lopez-de-Silanes & Andrei Shleifer. 2004. Do Institutions Cause Growth? Journal of Economic Growth

Glaeser, Edward, Jose Scheinkman & Andrei Shleifer. 2003. The Injustice of Inequality. Journal of Monetary Economics

Glass, Amy & Xiaodong Wu. 2004. Which Type of Foreign Direct Investment Is Most Hurt by Corruption? Working paper.

Gledhill, J. 2003. Old Economy, New Economy; Old Corruption, New Corruption. Social Analysis

Glewwe, P. et al. 2010. Teacher Incentives. American Economic Journal: Applied Economics

Global Witness. 2009. Undue Diligence: How Banks Do Business with Corrupt Regimes (London: Global Witness).

Gloppen, Siri. 2013. "Courts, Corruption and Judicial Independence", in Soreide, Tina & Aled Willams eds., Corruption, Grabbing and Development .

Godinez, J. & L. Liu. 2015. Corruption, Distance, and FDI Flows into Latin America. International Business Review

Godlee, F. 2015. Medical Corruption in the UK. BMJ: British Medical Journal.

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Goel, Rajeev & U. Mazhar. 2015. A Replication of “Corruption and Elections: An Empirical Study for a Cross-Section of Countries ( Economics & Politics 2009). Public Finance Review

Goel, Rajeev K. & Daniel P. Rich. 1989. On the Economic Incentive for Taking Bribes. Public Choice

Goel, Rajeev K. & Iikka Korhonen. 2011. exports and Cross-National Corruption: A Disaggregated Examination. Economic Systems

Goel, Rajeev K. & J.W. Saunoris. 2014. Global Corruption and the Shadow Economy: Spatial Aspects. Public Choice.

Goel, Rajeev K. & Michael A. Nelson. 1998. Corruption and Government Size: A Disaggregated Analysis. Public Choice.

Goel, Rajeev K. & Michael A. Nelson. 2005. Economic Freedom versus Political Freedom: Cross-Country Influences on Corruption. Australian Economic

Goel, Rajeev K. & Michael A. Nelson. 2007. Are Corrupt Acts Contagious?: Evidence from the United States. Journal of Policy Modeling

Goel, Rajeev K. & Michael A. Nelson. 2010. Causes of Corruption: History, Geography and Government. Journal of Policy Modeling

Goel, Rajeev K. & Michael A. Nelson. 2011. Government Fragmentation versus Fiscal Decentralization and Corruption. Public Choice

Goel, Rajeev K. & Michael A. Nelson. 2011. Measures of Corruption and Determinants of U.S. Corruption. Economics of Governance

Goel, Rajeev K. & Michael A. Nelson. 2014. Whistleblower Laws and exposed Corruption in the United States. Applied Economics

Goel, Rajeev K. 2014. Insurance Fraud and Corruption in the United States. Applied Financial Economics

Goel, Rajeev K. 2014. PACking a Punch: Political Action Committees and Corruption. Applied Economics

Goel, Rajeev K., J. Budak & E. Rajh. 2015. Private Sector Corruption and Effectiveness of Anti-Corruption Policies. Applied Economics Letters

Goel, Rajeev, Michael A. Nelson & M.A. Naretta. 2012. The Internet as an Indicator of Corruption Awareness. European Journal of Political Economy

Goerke, L. 2008. Bureaucratic Corruption and Profit Tax Evasion. Economics of Governance

Goetz, Anne-Marie. 2007. Political Cleaners: Women as the New Anti-Corruption Force?

Development & Change

Gokcekus, O. & R. Mukherjee. 2002. Public Sector Corruption and Gender Perceptions of Public Officials from Six Developing and Transition Countries. (Washington, D.C.: World Bank).

Gokcekus, O., E. Muchova & Z. Brincikova. 2015. Level and Quality of Openness and Corruption in ECA Countries. Applied Economics Letters.

Gokcekus, Omer & Jan Knorich. 2006. does Quality of Openness Affect Corruption? Economic Letters

Goldberg, Andrea. 2000. The Foreign Corrupt Practices Act and Structural Corruption. Boston University International Law Journal

Golden, Miriam & Eric C.C. Chang. 2001. Competitive Corruption: Factional Conflict and Political Malfeasance in Postwar Italian Christian Democracy. World Politics

Golden, Miriam & Lucio Picci. 2005. Proposal for a New Measure of Corruption, Illustrated with Italian Data. Economics & Politics

Golden, Miriam A. & Paasha Mahdavi. 2015. “The Institutional Components of Political Corruption”, in Gandhi, Jennifer & Ruben Ruiz-Rufino eds., Routledge Handbook of Comparative Political Institutions (New York: Routledge Press).

Golden, Miriam A. 2003. Electoral Connections: The Effects of the Personal Vote on Political Patronage, Bureaucracy and Legislation in Postwar Italy. British Journal of Political Science

Golden, Miriam A. 2012. Corruption in the Wealthy World. Brown Journal of World Affairs

Goldman, E., J. Rocholl & J. So. 2013. Politically Connected Boards of Directors and the Allocation of Procurement Contracts. Review of Finance

Goldsmith, Arthur A. 1999. Slapping the Grasping Hand: Correlates of Political Corruption in Emerging Markets. American Journal of Economics & Sociology

Goldsmith, Arthur A. 1999. Slapping the Grasping Hand: Correlates of Political Corruption in Emerging Markets. American Journal of Economics & Sociology

Golumbic, Court E. & Jonathan P. Adams. 2011. The “Dominant Influence” Test: The FCPA’s “Instrumentality” and “Foreign Official” Requirements and the Investment Activity of Sovereign Wealth Funds. American Journal of Criminal Law

Gong, T. & N. Zhou. 2015. Corruption and Marketization: Formal and Informal Rules in Chinese Public Procurement. Regulation & Governance

Gong, T. & Stephen Ma. 2012. Preventing Corruption in Asia. London: Taylor and Francis.

Gong, T. 2002. Dangerous Collusion: Corruption as a Collective Venture in Contemporary



1 China. Communist & Post-Communist Studies.

2 Gong, T. 2015. Managing Government Integrity Under Hierarchy: Anti-Corruption Efforts  
3 in Local China. *Journal of Contemporary China*

4 Gong, Ting & Jianming Ren. 2013. Hard Rules and Soft Constraints: Regulating Conflict of  
5 Interest in China. *Journal of Contemporary China*

6 Gong, Ting & Shiru Wang. 2013. Indicators and Implications of Zero Tolerance of  
7 Corruption: The Case of Hong Kong. *Social Indicators Research*

8 Gong, Ting. 1993. Corruption and Reform in China: An Analysis of Unintended  
9 Consequences. *Crime, Law, and Social Change*

10 Gong, Ting. 2006. Corruption and Local Governance: The Double Identity of Chinese Local  
11 Governments in Market Reform. *Pacific Review*

12 Gong, Ting. 2009. "The Institutionalization of Party Discipline in China: Dynamics and  
13 Dilemmas", in Gong, T. & S.K. Ma eds., *Preventing Corruption in Asia: Institutional Design and  
14 Policy Capacity* (London: Routledge),

15 Gong, Ting. 2011. An "Institutional Turn" in Integrity Management in China. *International  
16 Review of Administrative Sciences*

17 Gonzales, M.H., M.B. Kovera, J.L. Sullivan & V. Chanley. 1995. Private Reactions to  
18 Public Transgressions: Predictors of Evaluative Responses to Allegations of Political Misconduct.  
19 *Personality & Social Psychology Bulletin*

20 Gonzalez, Alvaro, J. Ernesto Lopez-Cordova & Elio E. Valladares. 2007. The Incidence of  
21 Graft on Developing-Country Firms. *World Bank Policy Research Working Paper 4394*.

22 Gonzalez, J.A. & L.R. Perez Floriano. 2015. If You Can't Take the Heat: Cultural Beliefs  
23 About Questionable Conduct, Stigma, Punishment, and Withdrawal Among Mexican Police  
24 Officers. *Organizational Studies* 36(5): 665-687.

25 Gonzalez, Luis, Werner Guth & M. Vittoria Levati. 2007. Speeding Up Bureaucrats by  
26 Greasing Them – An experimental Study. *Homo Oeconomicus*

27 Gonzalez-Fernandez, M. & C. Gonzalez-Velasco. 2014. Shadow Economy, Corruption and  
28 Public Debt in Spain. *Journal of Policy Modeling*.

Gonzalez-Ocantos, Ezequiel, Chad Kiewiet de Jonge, Carlos Melendez, Javier Osorio &  
David Nickersen. 2012. Vote Buying and Social Desirability Bias: experimental Evidence from  
Nicaragua. *American Journal of Political Science*

Good, Kenneth. 1994. Corruption and Mismanagement in Botswana: A Best-Case Example?  
*Journal of Modern African Studies*

Goodhand, Jonathan. 2008. Corruption or Consolidating the Peace? The Drugs Economy  
and Post-Conflict Peacebuilding in Afghanistan. *International Peacekeeping* 15(3): 405-423.



Goodspeed, Timothy, Jorge Martinez-Vazquez & Li Zhang. 2011. Public Policies and FDI Location: Differences Between Developing and Developed Countries. FinanzArchiv: Public Finance Analysis

Gooroochurn, N. & H. Gorg. 2015. Corruption and Productivity: Firm-Level Evidence. Jahrbucher Fur Nationalokonomie Und Statistik

Gordon, Daniel I. 2014. "Protecting the Integrity of the U.S. Federal Procurement System: Conflict of Interest Rules and Aspects of the System that Help Reduce Corruption", in Jean-Bernard Auby, Emmanuel Breen & Thomas Perroud eds., Corruption and Conflicts of Interest: A Comparative Law Approach

Gordon, Kathryn & Maiko Miyake. 2001. Business Approaches to Combating Bribery: A Study of Codes of Conduct. Journal of Business Ethics

Gordon, R. & Li, W. 2009. Tax Structures in Developing Countries: Many Puzzles and a Possible explanation. Journal of Public Economics

Gordon, Sanford C. & Gregory A. Huber. 2009. The Political Economy of Prosecution. Annual Review of Law & Social Science

Gordon, Sanford C. 2009. Assessing Partisan Bias in Federal Public Corruption Prosecutions. American Political Sciecn Review

Gorman, T.O. 2015. The Origins of the FCPA: Lessons for Effective Compliance and Enforcement. Securities Regulation Law Journal

Gorodnichenko, Yuriy & Klara Sabirianova Peter. 2007. Public Sector Pay and Corruption: Measuring Bribery from Micro Data. Journal of Public Economics

Gorta, Angela & Suzie Forell. 1995. Layers of Decision: Linking Social Definitions of Corruption and Willingness to Take Action. Crime, Law & Social Change

Gorta, Angela. 1998. Minmising Corruption: Applying Lessons from the Crime Prevention Literature. Crime, Law & Social Change

Gouda, Moamen & Sang-Min Park. 2015. Regligious Loyalty and Acceptance of Corruption. Journal of Economics & Statistics

Goudie, A.W. & D. Stasavage. 1998. A Framework for the Analysis of Corruption. Crime, Law & Social Change

Goudie, Andrew W. & David Stasavage. 1999. Corruption: The Issues. OECD Development Centre Working Paper No. 122.

Gould, David J. & Jose A. Amaro-Reyes. 1983. The Effects of Corruption on Administrative Performance: Illustrations from Developing Countries. World Bank Staff Working Paper No. 580.

- 1 Goyette, J. 2014. The Determinants of the Size Distribution of Firms in Uganda. European  
2 Journal of Development Research
- 3 Graeff, P. & G. Mehlkop. 2003. The Impact of Economic Freedom on Corruption: Different  
4 Patterns for Rich and Poor Countries. European Journal of Political Economy
- 5 Graham, John L. 1984. The Foreign Corrupt Practices Act: A New Perspective. Journal of  
6 International Business Studies
- 7 Gramckow, Heike. 2011. Preventing Corruption in Prosecutors Offices: Understanding and  
8 Managing for Integrity. World Bank Justice & Development Working Papers 15.
- 9 Granovetter, Mark. 2007. "The Social Construction of Corruption", in Victor Nee & Richard  
10 Swedberg eds., On Capitalism (Stanford University Press),
- 11 Gratton, Gabriele. 2013. The Sound of Silence: Political Accountability and Libel Law.  
12 European Journal of Political Economy
- 13 Gray, C.W., J. Hellman & R. Ryterman. 2004. Anticorruption in Transition 2: Corruption in  
14 Enterprise-State Interactions in Europe and Central Asia, 1999-2002. Washington, D.C.: World  
15 Bank.
- 16 Gray, H. 2015. The Political Economy of Grand Corruption in Tanzania. African Affairs
- 17 Gray, Larissa. 2012. "Recovering Corruptly Obtained Assets", in Adam Graycar & Russell  
18 G. Smith eds., Handbook of Global Research and Practice in Corruption ,
- 19 Graycar, A. & O. Monaghan. 2015. Rich Country Corruption. International Journal of  
20 Public Administration
- 21 Graycar, Adam & A. Sidebottom. 2012. Corruption and Control: A Corruption Reduction  
22 Approach. Journal of Financial Crime.
- 23 Graycar, Adam & Diego Villa. 2011. The Loss of Governance Capacity through Corruption.  
24 Governance
- 25 Graycar, Adam & Tim Prenzler. 2013. Understanding and Preventing Corruption. (Palgrave  
26 Pivot).
- 27 Graycar, Adam. 2015. Corruption: Classification and Analysis. Policy & Society
- 28 Gray-Molina, George, Ernesto Perez de Rada & Ernesto Yanez. 1999. Transparency and  
Accountability in Bolivia: does Voice Matter? IADB Working Paper
- GRECO. 2011. Lessons Learnt from the Three Evaluation Rounds (2000-2010).
- Green, A.J. 2012. United States v. Renzi: Reigning in the Speech or Debate Clause to Fight  
Corruption in Congress Post- Rayburn. BYU Law Review

Green, E. 2010. Patronage, District Creation, and Reform in Uganda. Studies in Comparative International Development

Green, P. & T. Ward. 2004. State Crime: Governments, Violence and Corruption (London: Pluto Press).

Green, Penny. 2005. Disaster by Design: Corruption, Construction and Catastrophe. British Journal of Criminology.

Green, S. 2005. "What's Wrong with Bribery?", in R. Duff & S. Green eds., Defining Crimes: Essays on Special Part of the Criminal Law (Oxford University Press).

Greenhill, Kelly M. 2009. "Kleptocratic Interdependence: Trafficking, Corruption, and the Marriage of Politics and Illicit Profits", in Robert I. Rotberg ed., Corruption, Global Security, and World Order.

Gregory, R. 2015. Political Independence, Operational Impartiality, and the Effectiveness of Anti-Corruption Agencies. Asian Education & Development Studies

Gregory, Robert J. 1999. Social Capital Theory and Administrative Reform: Maintaining Ethical Probity in Public Service. Public Administration Review

Griffin, Lisa Kern. 2011. The Federal Common Law of Corruption. North Carolina Law Review

Grigoli, Francesco & Zachary Mills. 2011. Do High and Volatile Levels of Public Investment Suggest Misconduct? The Role of Institutional Quality. World Bank Policy Research Working Paper 5735.

Grigorescu, Alexandru. 2006. The Corruption Eruption in East-Central Europe: The Increased Salience of Corruption and the Role of Intergovernmental Organizations. Eastern European Politics & Societies

Grimes, M. 2008. The Conditions of Successful Civil Society Involvement in Combating Corruption: A Survey of Case Study Evidence. Working paper.

Grimes, Marcia & Lena Wangnerud. 2010. Curbing Corruption through Social Welfare Reform? The Effects of Mexico's Conditional Cash Transfer Program on Good Government. American Review of Public Administration

Grimes, Marcia. 2013. The Contingencies of Societal Accountability: Examining the Link Between Civil Society and Good Government. Studies in Comparative International Development

Grimm, Daniel J. 2010. The Foreign Corrupt Practices Act in Merger and Acquisition Transactions: Successor Liability and Its Consequences. NYU Journal of Law & Business

Grodeland, Ase Berit. 2010. Elite Perceptions of Anti-Corruption Efforts in Ukraine. Global Crime

- 1 Groenendijk, Nico. 1997. A Principal-Agent Model of Corruption. Crime, Law & Social  
2 Change.
- 3 Gronlund, K. & M. Setala. 2011. In Honest Officials We Trust: Institutional Confidence in  
4 Europe. American Review of Public Administration.
- 5 Grooms, K. 2015. Enforcing the Clean Water Act: The Effect of State-Level Corruption on  
6 Compliance. Journal of Environmental Economics & Management
- 7 Groseclose, Timothy & Keith Krehbiel. 1994. Golden Parachutes, Rubber Checks, and  
8 Strategic Retirement from the 102d House. American Journal of Political Science
- 9 Grosfeld, I. & E. Zhuravskaya. 2015. Cultural vs. Economic Legacies of Empires: Evidence  
10 from the Partition of Poland. Journal of Comparative Economics
- 11 Gthnji, M. & F. Holmquist. 2012. Reform and Political Impunity in Kenya: Transparency  
12 without Accountability. African Studies Review
- 13 Gualiteri, Donato. 2013. A Helping Hand: The Influence of the 1997 OECD Convention in  
14 the Italian Fight Against Corruption. International Journal of Public Law & Policy
- 15 Guasch, J. Luis & Stephane Straub. 2009. Corruption and Concession Renegotiations:  
16 Evidence from the Water and Transport Sectors in Latin America. Utilities Policy
- 17 Guasch, J. Luis, Jean-Jacques Laffont & Stephane Straub. 2008. Renegotiation of  
18 Concession Contracts in Latin America: Evidence from the Water and Transport Sectors.  
19 International Journal of Industrial Organization
- 20 Gueorguiev, Dimitar & Edmund Malesky. 2012. Foreign Investment and Bribery: A Firm-  
21 Level Analysis of Corruption in Vietnam. Journal of Asian Economics
- 22 Guerrero, Manuel Alejandro. 2008. On the Individual Decision to Commit Corruption: A  
23 Methodological Complement. Journal of Economic Behavior & Organization .
- 24 Guetat, I. 2006. The Effects of Corruption on Growth Performance of the MENA Countries.  
25 Journal of Economics and Finance 30: 208-221.
- 26 Guiso, L., P. Sapienza & L. Zingales. 2009. Cultural Biases in Economic Exchange  
27 Quarterly Journal of Economics.
- 28 Gulati, M. & M.Y. Rao. 2007. "Corruption in the Electricity Sector: A Pervasive Scourge",  
in Campos, J. & S. Pradhan eds. The Many Faces of Corruption: Tackling Vulnerabilities at the  
Sector Level (Washington, D.C.: World Bank).
- Gundlach, Erich & Martin Paldam. 2009. The Transition of Corruption: From Poverty to  
Honesty. Economics Letters

- 1 Gunnar, H.K. 2015. Political Control and Perceptions of Corruption in Icelandic Local  
2 Government. Stjornmal Og Stjornsysla.
- 3 Guo, X. 2014. Controlling Corruption in the Party: China's Central Discipline Inspection  
4 Commission. China Quarterly 219: 597-624.
- 5 Guo, Y. & S. Li. 2015. Anti-Corruption Measures in China: Suggestions for Reforms. Asian  
6 Education & Development Studies
- 7 Gupta, A. 2005. Narratives of Corruption: Anthropological and Fictional Accounts of the  
8 Indian State. Ethnography
- 9 Gupta, Akhil. 1995. Blurred Boundaries: The Discourse of Corruption, the Culture of  
10 Politics, and the Imagined State. American Ethnologist
- 11 Gupta, Akhil. 2005. "Narrating the State of Corruption", in Dieter Haller & Chris Shore  
12 eds., Corruption: Anthropological Perspectives (Pluto Press).
- 13 Gupta, Manash Ranjan & Sarbajit Chaudhuri. 1997. Formal Credit, Corruption and the  
14 Informal Credit Market in Agriculture: A Theoretical Analysis. Economica
- 15 Gupta, Sanjeev, Hamid Davoodi & Erwin Tiongson. 2000. Corruption and the Provision of  
16 Health Care and Education Services. IMF Working Paper No. 00/116.
- 17 Gupta, Sanjeev, Hamid R. Davoodi & Rosa Alonso-Terme. 2002. does Corruption Affect  
18 Income Inequality and Poverty? Economics of Governance
- 19 Gupta, Sanjeev, Luiz R. De Mello & Raju Sharan. 2001. Corruption and Military Spending.  
20 European Journal of Political Economy
- 21 Gurgur, Tugrul & Anwar Shah. 2005. Localization and Corruption: Panacea or Pandora's  
22 Box? World Bank Policy Research Working Paper 3486.
- 23 Guriev, Sergei. 2004. Red Tape and Corruption. Journal of Development Economics
- 24 Gutmann, Jerg 2015. Believe, But Verify? The Effect of Market Structure on Corruption in  
25 Religious Groups. Kyklos
- 26 Gutmann, Jerg, Fabio Padovano & Stefan Voigt. 2015. Perception vs. experience:  
27 explaining Differences in Corruption Measures Using Microdata. Working paper.
- 28 Gutterman, E. 2015. Easier Done than Said: Transnational Bribery, Norm Resonance, and  
the Origins of the US Foreign Corrupt Practices Act. Foreign Policy Analysis
- Gutterman, Ellen. 2013. Easier Done Than Said: Transnational Bribery, Norm Resonance,  
and the Origins of the US Foreign Corrupt Practices Act. Foreign Policy Analysis.
- Gutterman, Ellen. 2014. The Legitimacy of Transnational NGOs: Lessons from the

1 experience of Transparency International in Germany and France. Review of International Studies

2 Guveneli, T. & R. Sanyal. 2012. Perception and Understanding of Bribery in International  
3 Business. Ethics & Behavior

4 Gyimah-Brempong, K. & S.M. De Camacho. 2006. Corruption, Growth, and Income  
5 Distribution: Are There Regional Differences? Economics of Governance

6 Gyimah-Brempong, K. 2001. Corruption, Economic Growth, and Income Inequality in  
7 Africa. Economics & Governance

8 Haber, S. & V. Menaldo. 2011. Do Natural Resources Fuel Authoritarianism? A Reappraisal  
9 of the Resource Curse. American Political Science Review

10 Habib, Mohsin & Leon Zurawicki. 2001. Country-Level Investments and the Effect of  
11 Corruption – Some Empirical Evidence. International Business Review

12 Habib, Mohsin & Leon Zurawicki. 2002. Corruption and Foreign Direct Investment. Journal  
13 of International Business Studie

14 Habib, Moshin & Leon Zurawicki. 2002. Corruption in the Context of International  
15 Business – Conceptual and Methodological Issues. Journal of Transnational Management  
16 Development

17 Hadamovsky, M. 2012. On the Relationship between Corruption and Migration. Working  
18 paper.

19 Hafner, O. 1998. The Role of Corruption in the Misappropriation of Tropical Forest  
20 Resources and in Tropical Forest Destruction. Working paper.

21 Hagenbuch, Stephen. 2012. Taming “Instrumentality”: The FCPA’s Legislative History  
22 Requires Proof of Government Control. University of Chicago Legal Forum

23 Hakkala, K., P. Norback & H. Svaleryd. 2002. Asymmetric Effects of Corruption on FDI:  
24 Evidence from Swedish Multinational Firms. Review of Economics & Statistics

25 Halim, Nafisa. 2008. Testing Alternative Theories of Bureaucratic Corruption in Less  
26 Developed Countries. Social Science Quarterly

27 Hall, D. 1999. Privatisation, Multinationals and Corruption. Development in Practice

28 Hall, Kath. 2013. Strategic Privatisation of Transnational Anti-Corruption Regulation.  
Australian Journal of Corporate Law

Hall, R.E. & C.I. Jones. 1999. Why Do Some Countries Produce So Much More Output Per  
Worker Than Others? Quarterly Journal of Economics

Hall, Richard L. & Robert P. van Houweling. 1995. Avarice and Ambition in Congress:  
Representatives’ Decisions to Run or Retire from the U.S. House. American Political Science

## Review

Hall, Thomas & Glenn Yago. 2000. Estimating the Cost of Opacity Using Sovereign Bond Spreads. Milken Institute Policy Brief No. 13.

Hall-Matthews, David. 2007. "Tickling Donors and Tackling Opponents: The Anti-Corruption Campaign in Malawi", in Sarah Bracking ed., Corruption and Development: The Anti-Corruption Campaigns (Palgrave Macmillan).

Hallward-Driemeier, Mary & Lant Pritchett. 2011. How Business Is Done and the "Doing Business" Indicators: The Investment Climate when Firms Have Climate Control. World Bank Policy Research Working Paper 5563.

Hallward-Driemeier, Mary. 2009. Who Survives? The Impact of Corruption, Competition and Property Rights Across Firms. World Bank Policy Research Working Paper 5084.

Hamilton-Hart, Natasha. 2001. Anti-Corruption Strategies in Indonesia. Bulletin of Indonesian Economic Studies

Hamra, Wayne. 2000. Bribery in International Business Transactions and the OECD Convention: Benefits and Limitations. Business Economics

Han Ping, Luke, Davin Chor, Quoc-Anh Do, & Karine Serfaty-de Medeiros. 2013. Corruption, Delays, and the Pattern of Trade. Working paper.

Hancock, Graham. 1989. Lords of Poverty: The Power, Prestige, and Corruption of the International Aid Business (Boston: Atlantic Monthly Press).

Hand, Jacqueline. 2005. Government Corruption and exploitation of Indigenous Peoples. Santa Clara Journal of International Law

Hanf, Matthieu, Astrid Van-Melle, Florence Fraisse, Amaury Roger, Bernard Carme & Mathieu Nacher. 2011. Corruption Kills: Estimating the Global Impact of Corruption on Children Deaths.

Hankiss, Elemer. 2002. "Games of Corruption: East Central Europe,

Kotkin & A. Sajo eds., Political Corruption in Transition: A Sceptic's Handbook (Budapest: Central European University Press).

Hanley, Sean & Allan Sikk. 2014. Economy, Corruption or Floating Voters? explaining the Breakthroughs of Anti-Establishment Reform Parties in Eastern Europe. Party Politics (forthcoming).

Hanlon, J. 2004. How Northern Donors Promote Corruption: Tales from the New Mozambique. Corner House Briefing 33.

Hanna, Rema & Shing-Yi Wang. 2013. Dishonesty and Selection into Public Service. NBER Working Paper No. 19649.



- 1 Hanna, Rema, Sarah Bishop, Sara Nadel, Gabe Scheffler & Katherine Durlacher. 2011.
- 2 The Effectiveness of Anti-Corruption Policy: What Has Worked, What Hasn't, and What
- 3 We Don't Know—A Systematic Review. Technical Report. London: EPPI-Centre, Social Science
- 4 Unit, Institute of Education, University of London.
- 5 Hanousek, J. & E. Kocenda. 2011. Public Investment and Fiscal Performance in the New
- 6 EU Member States. Fiscal Studies
- 7 Hansberry, Heidi L. 2012. In Spite of Its Good Intentions, the Dodd-Frank Act Has Created
- 8 an FCPA Monster. Journal of Criminal Law & Criminology
- 9 Hansen, Hans Krause. 2011. Managing Corruption Risks. Review of International Political
- 10 Economy
- 11 Haque, M. Emranul & B. Hussain. 2013. Where does Education Go? The Role of
- 12 Corruption. Working paper.
- 13 Haque, M. Emranul & K.C. Neanidis. 2009. Fiscal Transparency and Corruption. Working
- 14 paper.
- 15 Haque, M. Emranul & Richard A. Kneller. 2009. Corruption Clubs: Endogenous Thresholds
- 16 in Corruption and Development. Economics of Governance
- 17 Haque, M. Emranul & Richard Kneller. 2015. Why does Public Investment Fail To Raise
- 18 Economic Growth?: The Role of Corruption. The Manchester School
- 19 Haque, M. Emranul. 2011. Endogenous Detection in a Simple Model of Corruption and
- 20 Growth. Global Journal of Finance & Economics
- 21 Haque, M. Emranul. 2012. Unproductive Education in a Model of Corruption and Growth.
- 22 Working paper.
- 23 Harding, J. 2014. Corruption or Guanxi? Differentiating between the Legitimate, Unethical,
- 24 and Corrupt Activities of Chinese Government Officials. Pacific Basin Law Journal
- 25 Hardouin, Patrick. 2009. Banks, Governance and Public-Private Partnership in Preventing
- 26 and Confronting Organized Crime, Corruption and Terrorism Financing. Journal of Financial Crime
- 27 Hardy, Peter D. 1995. The Emerging Role of the Quid Pro Quo Requirement for Public
- 28 Corruption Prosecutions Under the Hobbs Act. University of Michigan Journal of Law Reform
- Harm, Christian. 2005. Political Determinants of Corporate Governance: Corruption and
- Other Forms of Rent Seeking. (unpublished working paper)
- Harms, Brian C. 2000. Holding Public Officials Accountable in the International Realm: A
- New Multi-Layered Strategy to Combat Corruption. Cornell International Law Journal



Harring, N. 2014. Corruption, Inequalities and the Perceived Effectiveness of Economic Pro-Environmental Policy Instruments: A European Cross-National Study. Environmental Science & Policy

Harring, Niklas. 2012. Understanding the Effects of Corruption and Political Trust on Willingness to Make Economic Sacrifices for Environmental Protection in a Cross-National Perspective. Social Science Quarterly

Harring, Niklas. 2013. Corruption, Inequalities and the Perceived Effectiveness of Economic Pro-Environmental Policy Instruments: A European Cross-National Study. Environmental Science & Policy.

Harrison, Elizabeth. 2006. Unpacking the Anti-Corruption Agenda: Dilemmas for Anthropologists. Oxford Development Studies

Harrison, Elizabeth. 2007. Corruption. Development in Practice

Harrison, Graham. 1999. Clean-Ups, Conditionality & Adjustment: Why Institutions Matter in Mozambique. Review of African Political Economy

Harrison, Graham. 1999. Corruption as “Boundary Politics”: The State, Democratization and Mozambique’s Unstable Liberalization. Third World Quarterly

Harrison, M. & B.Y. Kim. 2006. Plans, Prices, and Corruption: The Soviet Firm Under Partial Centralization, 1930 to 1990. Journal of Economic History

Harriss-White, Barbara & Gordon White. 1996. Corruption, Liberalization, and Democracy. IDS Bulletin

Harris-White, B. & G. White. 1996. Liberalization and New Forms of Corruption (Brighton: Institute of Development Studies).

Harsch, Ernest. 1993. Accumulators and Democrats: Challenging State Corruption in Africa. Journal of Modern African Studies

Harstad, Bard & Jakob Svensson. 2011. Bribes, Lobbying, and Development. American Political Science Review.

Hart, C.L. 2014. Money Laundering. American Criminal Law Review .

Hartman, Jennifer M. 1997. Government by Thieves: Revealing the Monsters Behind the Kleptocratic Masks. Syracuse Journal of International Law & Commerce.

Hasen, Richard L. 1993. An Enriched Economic Model of Political Patronage and Campaign Contributions: Reformulating Supreme Court Jurisprudence. Cardozo Law Review

Hasen, Richard L. 2004. Buckley Is Dead, Long Live Buckley: The New Campaign Finance Incoherence of McConnell v. Federal Election Commission. University of Pennsylvania Law Review

- 1 Hasker, Kevin & Cagla Okten. 2008. Intermediaries and Corruption. Journal of Economic  
2 Behavior & Organization
- 3 Hassaballa, H. 2015. The Effect of Corruption on Carbon Dioxide Emissions in the MENA  
4 Region. European Journal of Sustainable Development
- 5 Hassid, Jonathan & Jennifer N. Brass. 2015. Scandals, Media and Good Governance in  
6 China and Kenya. Journal of Asian & African Studies
- 7 Hasty, Jennifer. 2005. Sympathetic Magic/Contagious Corruption: Sociality, Democracy,  
8 and the Press in Ghana. Public Culture.
- 9 Hasty, Jennifer. 2005. The Pleasures of Corruption: Desire and Discipline in Ghanaian  
10 Political Culture. Cultural Anthropology.
- 11 Hatak, I., M. Fink & H. Frank. 2015. Business Freedom, Corruption and the Performance of  
12 Trusting Cooperation Partners: Empirical Findings from Six European Countries. Review of  
13 Managerial Science
- 14 Hatchard, John. 2012. Combating Corruption: Some Reflections on the Use of the Offence  
15 and the Tort of Misconduct/Misfeasance in Public Office. Denning Law Journal
- 16 Hatchard, John. 2014. Combating Corruption: Legal Approaches to Supporting Good  
17 Governance and Integrity in Africa
- 18 Haugeneder, Florian. 2009. Corruption in Investor-State Arbitration. Journal of World  
19 Investment & Trade
- 20 Hauk, Esther & Maria Saez-Marti. 2002. On the Cultural Transmission of Corruption.  
21 Journal of Economic Theory
- 22 Hauser, C. & J. Hogenacker. 2014. Do Firms Proactively Take Measures to Prevent  
23 Corruption in their International Operations? European Management Review
- 24 Hawthorne, Omar E. 2013. Transparency International's Corruption Perceptions Index: "Best  
25 Flawed" Measure on Corruption? Working paper.
- 26 He, Xin Frank. 2003. Sporadic Law Enforcement Campaigns as a Means of Social Control:  
27 A Case Study From a Rural-Urban Migrant Enclave in Beijing. Columbia Journal of Asian Law
- 28 He, Zhengke. 2000. Corruption and Anti-Corruption in Reform China. Communist & Post-  
Communist Studies
- Healy, Paul & George Serafeim. 2014. An Analysis of Firms' Self-Reported Anticorruption  
Efforts. Harvard Business School Working Paper
- Healy, Paul M. & Karthik Ramanna. 2013. When the Crowd Fights Corruption. Harvard  
Business Review:

- 1 Hearn, Rose Gill. 2012. "The Role of Education in Changing Corrupt Practices", in Adam
- 2 Graycar & Russell G. Smith eds., Handbook of Global Research and Practice in Corruption ,
- 3 Hearn, Rose Gill. 2014. does Corruption Drive Government Spending? Public
- 4 Administration Review
- 5 Hebous, S. & V. Lipatov. 2014. A Journey from a Corruption Port to a Tax Haven. Journal
- 6 of Comparative Economics
- 7 Hechanova, M.R.M., I. Melgar, P.Z. Falguera & M. Villaverde. 2014. Organisational
- 8 Culture and Workplace Corruption in Government Hospitals. Journal of Pacific Rim Psychology
- 9 Heckleman, J.C. & B. Powell. 2010. Corruption and the Institutional Environment for
- 10 Growth. Comparative Economic Studies 52: 351-378.
- 11 Heeks, R. 1999. Information Technology and the Management of Corruption. Development
- 12 in Practice
- 13 Heeks, R. 2002. Information Systems and Developing Countries: Failure, Success and Local
- 14 Improvisations. The Information Society
- 15 Heeks, Richard & Harald Mathisen. 2011. Understanding Success and Failure of Anti-
- 16 Corruption Initiatives. U4 Brief (March 2011).
- 17 Heeks, Richard. 1998. Information Technology and Public Sector Corruption. Working
- 18 paper.
- 19 Heeks, Richard. 2007. "Why Anti-Corruption Initiatives Fail: Technology Transfer and
- 20 Contextual Collision", in Sarah Bracking ed., Corruption and Development: The Anti-Corruption
- 21 Campaigns (Palgrave Macmillan)
- 22 Hefeker, Carsten. 2010. Taxation, Corruption and the Exchange Rate Regime. Journal of
- 23 Macroeconomics
- 24 Heidenheimer, Arnold J. & Michael Johnston, eds., Political Corruption: Concepts and
- 25 Contexts, 3rd edition (Transaction Publishers, 2009)
- 26 Heidenheimer, Arnold J. 1989. "Perspectives on the Perception of Corruption", in
- 27 Heidenheimer, Arnold J., M. Johnston & V. Le Vine eds., Political Corruption: A Handbook (New
- 28 Brunswick: Transaction)
- Heidenheimer, Arnold J. 1996. The Topography of Corruption: explorations in a
- Comparative Perspective. International Social Science Journal
- Heidenheimer, Arnold J. 2004. Disjunctions Between Corruption and Democracy? A
- Qualitative exploration. Crime, Law & Social Change
- Heifetz, David L. 2002. Japan's Implementation of the OECD Anti-Bribery Convention:

Pg 1634 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Weaker and Less Effective Than the U.S. Foreign Corrupt Practices Act. Pacific Rim Law & Policy Journal

Heilbrunn, J. 2011. "Post-Conflict Reconstruction, Legitimacy and Anti-Corruption Commissions", in C. Cheng & D. Zaum eds., Corruption and Post-Conflict Peacebuilding: Selling the Peace? (Abingdon: Routledge).

Heilbrunn, John R. 2005. Oil and Water? Elite Politicians and Corruption in France. Comparative Politics

Heilbrunn, John. 1999. "Corruption, Democracy, and Reform in Benin," in Schedler, Andreas et al. The Self-Restraining State: Power and Accountability in New Democracies. Boulder: Lynne Rienner Publishers.

Heilbrunn, John. 2004. Anticorruption Commissions: Panacea or Real Medicine to Fight Corruption? World Bank Institute Working Paper 37234.

Heilman, Bruce, Ng'wazak Kamata & Laurean Ndumbaro. 2000. Corruption, Politics, and Societal Values in Tanzania. Journal of Social Philosophy

Heimann, Fritz F. 1994 Should Foreign Bribery Be a Crime?

Hein, M. 2015. The Fight Against Government Corruption in Romania: Irreversible Results or Sisyphean Challenge? Europe-Asia Studies

Heineman, Ben W., Jr.. 2008. High Performance with High Integrity (Cambridge: Harvard Business Review Press).

Heinrich, Finn & Robin Hodess. 2012. "Measuring Corruption", in Adam Graycar & Russell G. Smith eds., Handbook of Global Research and Practice in Corruption ,

Helle, Svein-Erik & Lise Rakner. 2013. "'Grabbing' an Election: Abuse of State Resources in the 2011 Elections in Uganda", in Soreide, Tina & Aled Williams eds., Corruption, Grabbing and Development .

Heller, N. 2009. "Defining and Measuring Corruption: Where Have We Come From, Where Are We Now, and What Matters for the Future?", in R. Rotberg ed., Corruption, Global Security, and World Order (Washington, D.C.: Brookings Institution Press).

Helliwell, J.F. & H.F. Huang. 2008. How's Your Government? International Evidence Linking Good Government and Well-Being. British Journal of Political Science

Hellman, Joel & Daniel Kaufmann. 2001. Confronting the Challenges of State Capture in Transition Economies. Finance & Development

Hellman, Joel & Mark Schankermann. 2000. Intervention, Corruption and Capture: The Nexus between Enterprises and the State. Economics of Transition

Hellman, Joel S. 1998. Winners Take All: The Politics of Partial Reform in Postcommunist

Transitions. World Politics.

Hellman, Joel S., Geraint Jones & Daniel Kaufmann. 2000. Seize the State, Seize the Day: State Capture and Influence in Transition Economies. Journal of Comparative Economics

Hellman, Joel S., Geraint Jones & Daniel Kaufmann. 2006. "Far from Home: Do Foreign Investors Import Higher Standards of Governance in Transition Economies?", in Clarke, T. & M. Dela Rama eds., Corporate Governance and Globalization (New York: Sage)

Hellmann, Olli. 2014. explaining the Institutionalization of Political Corruption: The Effects of Colonial Rule and Decolonization. Working paper.

Helmer, Elena & Stuart H. Deming. 2011. Non-Governmental Organizations: Anticorruption Compliance Challenges and Risks. International Lawyer

Helmer, Elena. 2008. Corruption in International Commercial Arbitration: Fiona Trust & Holding Corp. v. Privalov. International Arbitration News .

Helmy, Heba E. 2013. The Impact of Corruption on FDI: Is MENA an Exception? International Review of Applied Economics

Henderson, J. Vernon & Ari Kuncoro. 2006. Corruption in Indonesia. NBER Working Paper 10674.

Henderson, J. Vernon & Ari Kuncoro. 2011. Corruption and Local Democratization in Indonesia: The Role of Islamic Parties. Journal of Development Economics

Hendrix, Steven E. 2005. New Approaches to Addressing Corruption in the Context of U.S. Foreign Assistance with Examples from Latin America and the Caribbean. Southwestern Journal of Law & Trade in the Americas

Henning, Patrick & Lee Radek. 2011. The Prosecution and Defense of Public Corruption: The Law and Legal Strategies. Oxford University Press.

Henning, Peter J. 2001. Public Corruption: A Comparative Analysis of International Corruption Conventions and United States Law. Arizona Journal of International & Comparative Law

Henning, Peter J. 2003. Federalism and the Federal Prosecution of State and Local Corruption, Kentucky Law Journal

Henning, Peter J. 2009. Corporate Criminal Liability and the Potential for Rehabilitation. American Criminal Law Review

Henning, Peter J. 2012. Be Careful What You Wish For: Thoughts on a Compliance Defense Under the Foreign Corrupt Practices Act. Ohio State Law Journal

Henning, Peter J. 2012. Making Sure "The Buck Stops Here": Barring Executives for Corporate Violations. University of Chicago Legal Forum

- 1 Hepburn, J. 2014. In Accordance with Which Host State Laws? Restoring the “Defense” of  
2 Investor Illegality in Investment Arbitration. *Journal of International Dispute Settlement*
- 3 Hernandez, Teresa & Robert W. McGee. 2014. Ethical Attitudes Toward Taking a Bribe: A  
4 Study of Three Latin American Countries. Working paper.
- 5 Herrera, Ana Maria, Lebohang Lijane & Peter Rodriguez. 2007. Bribery and the Nature of  
6 Corruption. Unpublished manuscript, Michigan State University.
- 7 Herrera, J., M. Razafindrakoto & F. Roubaud. 2007. Governance, Democracy and Poverty  
8 Reduction: Lessons Drawn from Household Surveys in Sub-Saharan Africa and Latin America.  
9 *International Statistical Review*
- 10 Herrick, Rebekah L. 2000. Who Will Survive? An exploration of Factors Contributing to the  
11 Removal of Unethical House Members. *American Politics Research*
- 12 Herring, Cheryl Crumpton. 2001. 18 U.S.C. § 666: Is It a Blank Check to Federal  
13 Authorities Prosecuting State and Local Corruption? 52 *Ala. L. Rev.*
- 14 Hertog, S. 2010. Defying the Resource Curse: explaining Successful State-Owned  
15 Enterprises in Rentier States. *World Politics* 62(2):
- 16 Herzfeld, Thomas & Christoph Weiss. 2003. Corruption and Legal (In)Effectiveness: An  
17 Empirical Investigation. *European Journal of Political Economy*
- 18 Herzfeld, Thomas & Christoph Weiss. 2007. Corruption Clubs: Empirical Evidence from  
19 Kernel Density Estimates. *Applied Economics*
- 20 Hess, David & Cristie L. Ford. 2008. Corporate Corruption and Reform Undertakings: A  
21 New Approach to an Old Problem. *Cornell International Law Journal*
- 22 Hess, David & Thomas W. Dunfee. 2000. Fighting Corruption: A Principled Approach; The  
23 C2 Principles (Combating Corruption), *Cornell International Law Journal*
- 24 Hess, David & Thomas W. Dunfee. 2003. “Taking Responsibility for Bribery: The  
25 Multinational Corporation’s Role in Combating Corruption”, in R. Sullivan ed., *Business and*  
26 *Human Rights: Dilemmas and Solutions* (Sheffield, UK: Greenleaf Publishing)
- 27 Hess, David. 2009. Catalyzing Corporate Commitment to Combating Corruption. *Journal of*  
28 *Business Ethics*
- Hess, David. 2011. “Combating Corruption in International Business through Voluntary  
Governance Initiatives”, in T. Hale & D. Held eds., *Transnational Governance Innovation*  
(Cambridge, UK: Polity Press)
- Hess, David. 2012. Combating Corruption through Corporate Transparency: Using  
Enforcement Discretion to Improve Disclosure. *Minnesota Journal of International Law*

Hess, David. 2012. Enhancing the Effectiveness of the Foreign Corrupt Practices Act Through Corporate Social Responsibility. *Ohio State Law Journal*

Hessami, Z. 2014. Political Corruption, Public Procurement, and Budget Composition: Theory and Evidence from OECD Countries. *European Journal of Political Economy*

Hessami, Zohal, Claudio Thum & Silke Uebelmesser. 2012. A Political Economy explanation for In-kind Redistribution: The Interplay of Corruption and Democracy. Working Paper.

Hessami, Zohal. 2010. Corruption and the Composition of Public expenditures: Evidence from OECD Countries. MPRA Paper 25945.

Hessami, Zohal. 2011. On the Link Between Government Ideology and Corruption in the Public Sector. (unpublished manuscript)

Hetzer, W. 2008. Corruption as Business Practice? Criminal Responsibility of Enterprises in the European Union. *ERA Forum*

Heymann, Philip B. 1997. Democracy and Corruption. *Fordham International Law Journal*

Heymann, Philip B. Four Unresolved Questions About the Responsibilities of an Independent Counsel. *Georgetown Law Journal*

Heyneman, Stephen P. 2004. Education and Corruption. *International Journal of Educational Development*

Heyneman, Stephen P. 2007. Buying Your Way into Heaven: The Corruption of Education Systems in Global Perspective. *Perspectives on Global Issues*

Heyneman, Stephen P. 2011. The Corruption of Ethics in Higher Education. *International Higher Education*

Heyneman, Stephen P., Kathryn H. Anderson & Nazym Nuraliyeva. 2008. The Cost of Corruption in Higher Education. *Comparative Education Review*

Heywood, Paul M. & Jonathan Rose. 2014. "Close But No Cigar": The Measurement of Corruption. *Journal of Public Policy*

Heywood, Paul M. & Jonathan Rose. 2014. "Close But No Cigar": The Measurement of Corruption. *Journal of Public Policy*.

Heywood, Paul M. 2015. "Measuring Corruption: Perspectives, Critiques and Limits" , in Paul M. Heywood ed., *The Routledge Handbook of Political Corruption* (New York: Routledge)

Heywood, Paul. 1997. Political Corruption: Problems and Perspectives. *Political Studies*

Hibbs, Douglas & Violeta Piculescu. 2005. Institutions, Corruption and Tax Evasion in the Unofficial Economy. Working paper.



- 1 Hibbs, Douglas A., Jr. & Violeta Piculescu. 2010. Tax Toleration and Tax Compliance:  
2 How Government Affects the Propensity of Firms to Enter the Unofficial Economy. *American*  
3 *Journal of Political Science*
- 4 Hicken, Allen D. 2007. "How Do Rules and Institutions Encourage Vote Buying?", in  
5 Frederic Charles Schaffer ed., *Elections for Sale: The Causes and Consequences of Vote Buying*  
6 (Boulder, CO: Lynne Rienner)
- 7 Hicken, Allen. 2011. Clientalism. *Annual Review of Political Science*
- 8 Hidalgo, F. Daniel & Simeon Nichter. 2014. Voter Buying: Shaping the Electorate through  
9 Clientalism. Working paper.
- 10 Hill, Kim Quaile. 2003. Democratization and Corruption: Systematic Evidence from the  
11 American States. *American Political Research*
- 12 Hillman, A.L. & E. Katz. 1987. Hierarchical Structure and the Social Costs of Bribes and  
13 Transfers. *Journal of Public Economics*
- 14 Hillman, Arye L. 2004. Corruption and Public Finance: An IMF Perspective. *European*  
15 *Journal of Political Economy*
- 16 Hills, L. 2014. Universal Anti-Bribery Legislation Can Save International Business: A  
17 Comparison of the FCPA and UKBA in an Attempt to Create Universal Legislation to Combat  
18 Bribery Around the Globe. Working paper.
- 19 Hills, Roderick M., Jr. 2005. Corruption and Federalism: (When) Do Federal Criminal  
20 Prosecutions Improve Non-Federal Democracy? 6 *Theoretical Inquiries L.*
- 21 Hilson, Gavin & Roy Maconachie. 2009. "Good Governance" and the Extractive Industries  
22 in Sub-Saharan Africa. *Mineral Processing & Extractive Metallurgy Review*
- 23 Hinchey, Bruce. 2011. Punishing the Penitent: Disproportionate Fines in Recent FCPA  
24 Enforcements and Suggested Improvements. *Public Contract Law Journal*
- 25 Hindess, Barry. 2001. "Good Government and Corruption" in Peter Larmour & Nick  
26 Wolanin, eds., *Corruption and Anti-Corruption* (Canberra: Asia Pacific Press)
- 27 Hindess, Barry. 2008. "International Anti-Corruption as a Program of Normalisation", in de  
28 Sousa, Luis, Peter Marmour & Barry Hindess eds., *Governments, NGOs and Anti-Corruption: The*  
*New Integrity Warriors* (London: Routledge).
- Hindriks, Jean, Michael Keen & Abhinay Muthoo. 1999. Corruption, Extortion and Evasion.  
*Journal of Public Economics*
- Hines, James R. 1995. Forbidden Payment: Foreign Bribery and American Business After  
1977. NBER Working Paper No. 5266.



1 Hines, Nicole Y. 2007. Cultural Due Diligence: The Lost Diligence that Must Be Found by  
2 U.S. Corporations Conducting M&A Deals in China to Prevent Foreign Corrupt Practices Act  
Violations. Duquesne Business Law Journal

3 Hinks, Timothy & Artjoms Ivlevs. 2014. Communist Party Membership and Bribe Paying in  
4 Transitional Economies. Working paper.

5 Hite-Rubin, Nancy. 2015. "A Corruption, Military Procurement and FDI Nexus? ", in Susan  
6 Rose-Ackerman & Paul Lagunes eds., Greed, Corruption, and the Modern State .

7 Hobbs, Nathaniel. 2005. Corruption in World Bank Financed Projects: Why Bribery is a  
8 Tolerated Anathema. Development Studies Institute Working Paper

9 Hodder, R. 2015. What's Wrong with Patronage? Society

10 Hodder, Rupert. 2009. Political Interference in the Philippine Civil Service. Environment &  
Planning C: Government & Policy

11 Hodess, Robin. 2013. "Civil Society and Nongovernmental Organizations as International  
12 Actors in Anti-Corruption Advocacy", in Susan Rose-Ackerman & Paul D.

13 Carrington eds., Anti-Corruption Policy: Can International Actors Play a Constructive Role?  
14 (Durham: Carolina Academic Press)

15 Hodge, Andrew, Sriram Shankar, D.S. Prasada Rao & Alan Duhs. 2011. exploring the Links  
Between Corruption and Growth. Review of Development Economics

16 Hodgkinson, P. 1997. The Sociology of Corruption, Some Themes and Issues. Sociology

17 Hodgson, G.M. 2006. Institutions, Recessions and Recovery in the Transitional Economies.  
18 Journal of Economic Issues

19 Hodgson, Geoffrey M. & Shuxia Jiang. 2007. The Economics of Corruption and the  
20 Corruption of Economics: An Institutionalist Perspective. Journal of Economic Issues 41: 1043-.

21 Hodler, Roland & Paul A. Raschky. 2014. Regional Favoritism. Quarterly Journal of  
22 Economics.

23 Hodler, Roland. 2006. The Curse of Natural Resources in Fractionalized Countries.  
European Economic Review

24 Hoff, Karla & Joseph E. Stiglitz. 2005. The Creation of the Rule of Law and the Legitimacy  
25 of Property Rights: The Political and Economic Consequences of a Corrupt Privatization. NBER  
Working Paper 11772.

26 Hofstede, Geert. 2001. Culture's Consequences: Comparing Values, Behaviors, Institutions,  
27 and Organizations Across Nations (2d ed.) (Beverly Hills, CA: Sage).

28 Hogarth, John. 1995. Developments in Criminal Law and Criminal Justice: Bribery of  
Officials in Pursuit of Corporate Aims. Crim. L. F.

- 1 Holcombe, R. & C. Boudreaux. 2015. Regulation and Corruption. Public Choice .
- 2 Holloway, Richard. 2001. Corruption and Civil Society Organisations in Indonesia. .
- 3 Holloway, Richard. 2010. NGOs: Losing the Moral High Ground—Corruption and
- 4 Misrepresentation.
- 5 Hollyer, J.R., B.P. Rosendorff & J.R. Vreeland. 2014. Measuring Transparency. Political
- 6 Analysis
- 7 Hollyer, James & Leonard Wantchekon. 2015. Corruption and Ideology in Autocracies.
- 8 Journal of Law, Economics & Organization
- 9 Holm, John D. 2000. “Curbing Corruption through Democratic Accountability: Lessons
- 10 from Botswana,” in Kempe Ronald Hope Sr. & Bornwell C. Chikulo eds., Corruption and
- 11 Development in Africa (London, Palgrave)
- 12 Holmberg, Soren & Bo Rothstein. 2011. Dying of Corruption. Health Economics, Policy &
- 13 Law
- 14 Holmberg, Soren & Bo Rothstein. 2011. Quality of Government and Access to Safe Water.
- 15 QoG Working Paper Series.
- 16 Holmberg, Soren, Bo Rothstein & N. Nasiritousi. 2009. Quality of Government: What You
- 17 Get. Annual Review of Political Science.
- 18 Holmes, L. 2006. Rotten States? Corruption, Post-Communism, and Neoliberalism
- 19 (Durham, NC: Duke University Press)
- 20 Holmes, L. 2007. Terrorism, Organised Crime and Corruption: Networks and Linkages.
- 21 Oxford.
- 22 Holmes, L. 2015. Different Paths to Curbing Corruption: Lessons from Denmark, Finland,
- 23 Hong Kong, New Zealand and Singapore. Asian Journal of Political Science
- 24 Holmes, Leslie. 1993. The End of Communist Power: Anti-Corruption Campaigns and
- 25 Legitimation Crisis.
- 26 Holmes, Leslie. 1997. Corruption and the Crisis of the Post-Communist State. Crime, Law
- 27 & Social Change
- 28 Holmes, Leslie. 1999. Corruption in Europe. Dialogue
- Holmes, Leslie. 2001. “Crime, Corruption and Politics: International and Transnational
- Factors”, in J. Zielonka & A. Pravda eds., Democratic Consolidation in Eastern Europe:
- International and Transnational Factors, Vol. 2 (Oxford: Oxford University Press), pp.
- Holmes, Leslie. 2003. “Political Corruption in Central and Eastern Europe”, in M. Bull & J.

Newell eds., Corruption in Contemporary Politics (London: Palgrave)

Holmes, Leslie. 2005. "Russian Corruption and State Weakness in Comparative Post-Communist Perspective", in A. Pravda ed., Leading Russia: Putin in Perspective (Oxford: Oxford University Press)

Holmes, Leslie. 2007. "The Corruption-Organized Crime Nexus in Central and Eastern Europe," in Leslie Holmes ed., Terrorism, Organised Crime and Corruption

Holmes, Leslie. 2008. "Political Corruption Scandals and Public Attitudes towards Party Financing: Poland and Germany Compared", in S. Eliaeson ed., Building Civil Society and Democracy in New Europe (Newcastle: Cambridge Scholars Publishing)

Holmes, Leslie. 2008. Corruption and Organised Crime in Putin's Russia. Europe-Asian Studies

Holmes, Leslie. 2012. "Corruption and Financial Crises", in Ralph Pettman ed., Handbook on International Political Economy (World Scientific Publishing)

Holmes, Leslie. 2012. "Transnational Crime, Corruption and Conflict in Russia and the Former USSR", in Matthew Sussex ed., Conflict in the Former USSR (Cambridge University Press)

Holmes, Leslie. 2012. Corruption in Post-Soviet Russia. Global Change, Peace & Security

Holmes, Leslie. 2013. Postcommunist Transitions and Corruption: Mapping Patterns. Social Research

Holmes, Leslie. 2013. The Internationalisation of Corruption: Scale, Impact and Countermeasures. Crime, Law & Social Change .

Holmes, Leslie. 2014. "Police Corruption from Many Perspectives", in Leslie Holmes ed., Police Corruption: Essential Readings .

Holmes, Leslie. 2015. Combating Corruption in China: The Role of the State and Other Agencies in Comparative Perspective. Economic & Political Studies

Holmes, Ronald D. 2007. "Combating Corruption in the Philippines: The Difficulty and Danger of Organizational Reform/Human Resource Development Initiatives", in Ma Concepcion P. Alfiler & Eleanor E. Nicolas, eds., Public Administration plus Governance: Assessing the Past, Addressing the Future. (Quezon City: National College of Public Administration and Governance, University of the Philippines)

Holtzblatt, M. & N. Tschakert. 2014. Baker Hughes: Greasing the Wheels in Kazakhstan (FCPA Violations and Implementation of a Corporate Ethics and Anti-Corruption Compliance Program). Journal of Accounting Education 32(1): 36-60.

Hooghe, M. & E. Quintelier. 2014. Political Participation in European Countries: The Effect of Authoritarian Rule, Corruption, Lack of Good Governance and Economic Downturn. Comparative European Politics

- 1 Hope, K. 2000. "Corruption and Development in Africa", in Hope, K. & B. Chikulo eds.,  
2 Corruption and Development in Africa: Lessons from Country Case Studies (London: Macmillan).
- 3 Hope, K.R. 2014. Kenya's Corruption Problem: Causes and Consequences. Commonwealth  
4 & Comparative Politics
- 5 Hopkin, Jonathan & Andres Rodriguez-Pose. 2007. "Grabbing Hand" or "Helping Hand"?  
6 Corruption and the Economic Role of the State. Governance: An International Journal of Policy &  
Administration
- 7 Hopkin, Jonathan. 1997. Political Parties, Political Corruption, and the Economic Theory of  
8 Democracy. Crime, Law & Social Change
- 9 Hopkin, Jonathan. 2002. States, Markets and Corruption: A Review of Some Recent  
10 Literature. Review of International Political Economy .
- 11 Hoppe, T. 2014. The Case for Asset Declarations in the Judiciary: Identifying Illicit  
Enrichment and Conflicts of Interest. U4 Brief (Bergen: Chr. Michelsen Institute).
- 12 Horowitz, Shale, Karla Hoff & Branko Milanovic. 2009. Government Turnover: Concepts,  
13 Measures and Applications. European Journal of Political Research
- 14 Hostetler, Courtney. 2011. Going From Bad to Good: Combating Corporate Corruption on  
15 World Bank-Funded Infrastructure Projects. Yale Human Rights & Development Law Journal
- 16 Hotchkiss, Carolyn. 1998. The Sleeping Dog Stirs: New Signs of Life in Efforts to End  
Corruption in International Business. J. Pub. Pol'y & Marketing
- 17 Hough, Dan. 2013. Corruption, Anti-Corruption and Governance. London: Palgrave.
- 18 Houillon, Gregory. 2014. "Corruption and Conflicts of Interest: Future Prospects on  
19 Lobbying", in Jean-Bernard Auby, Emmanuel Breen & Thomas Perroud eds., Corruption and  
20 Conflicts of Interest: A Comparative Law Approach
- 21 Hoyland, B., K.O. Moene & F. Willumsen. 2012. The Tyranny of Internatioanl Index  
22 Rankings. Journal of Development Economics
- 23 Hsieh, C.R. & Moretti, E. 2006. Did Iraq Cheat the United Nations? Underpricing, Bribes,  
and the Oil for Food Program. Quarterly Journal of Economics
- 24 Hu, Xinli. 2015. Effectiveness of Information Technology in Reducing Corruption in China:  
25 A Validation of the DeLone and McLean Information Systems Success Model. The Electronic  
Library
- 26 Huang, H. & Z. Li. 2015. Procurement Auctions with Ex-Ante Endogenous Bribery.  
27 Economic Modelling.
- 28 Huang, Peter H. & Ho-Mou Wu. 1994. More Order without More Law: A Theory of Social

1 Norms and Organizational Cultures. Journal of Law, Economics & Organization

2 Huang, Yasheng. 2008. Capitalism with Chinese Characteristics: Entrepreneurship and the  
3 State.

4 Huang, Z., L. Liu, W. Zheng, X. Tan & X. Zhao. 2015. Walking the Straight and Narrow:  
5 The Moderating Effect of Evaluation Apprehension on the Relationship Between Collectivism and  
6 Corruption

7 Hubbard, Paul. 2007. Putting the Power of Transparency in Context: Information's Role in  
8 Reducing Corruption in Uganda's Education Sector. Center for Global Development Working  
9 Paper 136.

10 Huberts, Leo W.J.C. 1998. What Can Be Done Against Public Corruption and Fraud: expert  
11 Views on Strategies to Protect Public Integrity. Crime, Law & Social Change

12 Huberts, Leo W.J.C. 2000. Anticorruption Strategies: The Hong Kong Model in  
13 International Context. Public Integrity

14 Huberts, Leo. 1995. Western Europe and Public Corruption: experts' Views on Attention,  
15 Extent and Strategies. European Journal on Criminal Policy & Research

16 Hughes, Alexander G. 2013. Drawing Sensible Borders for the Definition of "Foreign  
17 Official" Under the FCPA. American Journal of Criminal Law

18 Hunt, Jennifer & Sonia Laszlo. 2005. Bribery: Who Pays, Who Refuses, What Are the  
19 Payoffs? NBER Working Paper 11635.

20 Hunt, Jennifer & Sonia Laszlo. 2011. Is Bribery Really Regressive? Bribery's Costs,  
21 Benefits, and Mechanisms. World Development

22 Hunt, Jennifer. 2004. Trust and Bribery: The Role of the Quid Pro Quo and the Link with  
23 Crime. NBER Working Paper 10510.

24 Hunt, Jennifer. 2005. Why Are Some Public Officials More Corrupt Than Others? NBER  
25 Working Paper No. 11595.

26 Hunt, Jennifer. 2007. How Corruption Hits People When They Are Down. Journal of  
27 Development Economics

28 Hunt, Jennifer. 2010. Bribery in Health Care in Uganda. Journal of Health Economics

Hunt, Sinead. 2011. Refining Black Gold: The Dodd-Frank Act and Corruption in the Oil  
Industry. UCLA Journal of International Law & Foreign Affairs

Hunter, Sharifa G. 2011. A Comparative Analysis of the Foreign Corrupt Practices Act and  
the U.K. Bribery Act, and the Practical Implications of Both on International Business. ISLA  
Journal of International & Comparative Law

Pg 1644 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Hurson, Daniel W. 2001. Mail Fraud, the Intangible Rights Doctrine, and the Infusion of  
2 State Law: A Bermuda Triangle of Sorts. Houston Law Review
- 3 Huskins, Priya Cherian. 2009. FCPA Prosecutions: Liability Trend to Watch. Stanford Law  
4 Review
- 5 Hussman, Karen. 2007. Anti-Corruption Policy Making in Practice: What Can Be Learned  
6 for Implementing Article 5 of UNCAC? Report of Six Country Case Studies: Georgia, Indonesia,  
7 Nicaragua, Pakistan, Tanzania and Zambia. U4 Report
- 8 Hussmann, K. 2007. Anti-Corruption Policy Making in Practice: What Can Be Learned for  
9 Implementing Article 5 of UNCAC? Synthesis Report of Six Country Case Studies: Georgia,  
10 Indonesia, Nicaragua, Pakistan, Tanzania, and Zambia. (Bergen: CMI).
- 11 Hussmann, K., H. Hechler & M. Penalillo. 2009. Institutional Arrangements for Corruption  
12 Prevention: Considerations for the Implementation of the United Nations Convention Against  
13 Corruption. U4 Issue
- 14 Husted, Bryan W. 1994. Honor Among Thieves: A Transaction-Cost Interpretation of  
15 Corruption in Third World Countries. Business Ethics Quarterly
- 16 Husted, Bryan W. 1999. Wealth, Culture, and Corruption. Journal of International Business  
17 Studies
- 18 Hutchcroft, Paul. 1997. The Politics of Privilege: Assessing the Impact of Rents, Corruption,  
19 and Clientalism on Third World Development. Political Studies
- 20 Huther, Jeff & Anwar Shah. 2000. Anti-Corruption Programs and Policies: A Framework  
21 for Evaluation. World Bank Policy Research Working Paper #2501.
- 22 Hwang, J. 2002. A Note on the Relationship Between Corruption and Government. Journal  
23 of Development Economics
- 24 Hwang, Michael S.C. & Kevin Lim. 2012. Corruption in Arbitration – Law and Reality.  
25 Asian International Arbitration Journal
- 26 Idakwoji, S.P. 2010. Leadership, Corruption and Development. 2010. Canadian Social  
27 Science
- 28 Ifeka, C. 2001. Playing Civil Society Tunes: Corruption and Misunderstanding Nigeria's  
"Real" Political Institutions. Review of African Political Economy
- Imi, A. 2007. Escaping from the Resource Curse: Evidence from Botswana and the Rest of  
the World. IMF Staff Paper 54(4).
- Ikharehon, J.J. & N. Omoregie. 2015. Corruption and Poverty Challenges in Nigeria.  
Indian Journal of Commerce & Management Studies

Pg 1645 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Imai, M. 2006. Mixing Family Business with Politics in Thailand. Asian Economic Journal
- 2 In'airat, Mohammad. 2014. Aid Allocation, Selectivity, and the Quality of Governance.
- 3 Journal of Economics, Finance & Administrative Science
- 4 Infante, L. & M. Piazza. 2014. Political Connections and Preferential Lending at Local
- 5 Level: Some Evidence from the Italian Credit Market. Journal of Corporate Finance
- 6 Ingle, Robert Ingle & Sandy McClure. 2008. The Soprano State: New Jersey's Culture of
- 7 Corruption. New York: St. Martin's Press.
- 8 International Council on Human Rights Policy & Transparency International. 2009.
- 9 Corruption and Human Rights: Making the Connection.
- 10 International Council on Human Rights Policy. 2010. Integrating Human Rights in the Anti-
- 11 Corruption Agenda: Challenges, Possibilities and Opportunities.
- 12 Ionescu, Luminita. 2010. The Relationship Between Government Effectiveness and
- 13 Corruption. Economics, Management & Financial Markets
- 14 Ionescu, Luminita. 2014. The Adverse Effects of Corruption on Growth and Development.
- 15 Economics, Management & Financial Markets
- 16 Ionescu, Luminita. 2015. The Economics of Corruption in Professional Sport. Economics,
- 17 Management & Financial Markets
- 18 Ionescu, Luminita. 2015. The Role of E-Government in Curbing the Corruption in Public
- 19 Administration. Economics, Management & Financial Markets
- 20 Iossa, Elisabetta & David Martimort. 2011. Corruption in Public Private Partnerships.
- 21 Working paper.
- 22 Iossa, Elisabetta & David Martimort. 2011. Post-Tender Corruption and Risk Allocation:
- 23 Implications for Public-Private Partnerships. CEIS Research Paper 195, Tor Vargata University.
- 24 Iqbal, M. & J. Seo. 2008. E-Governance as an Anti-Corruption Tool: Korean Cases. Korean
- 25 Local Information
- 26 Isaksson, A. 2015. Corruption Along Ethnic Lines: A Study of Individual Corruption
- 27 experiences in 17 African Countries. Journal of Development Studies
- 28 Isham, Jonathan, Jr., Michael Woolcock, Lant Pritchett & Gwen Busby. 2005. The Varieties
- of Resource experience: Natural Resource export Structures and the Political Economy of
- Economic Growth. World Bank Economic Review.
- Ishiguro, S. 2004. Collusion and Discrimination in Organizations. Journal of Economic
- Theory
- Islam, M. 2014. Bribery and Corruption in Australian Local Councils. Public Money &



1 Management

2 Islam, M., S. Haque, T. Dissanayake, P. Leung & K. Handley. 2015. Corporate Disclosure  
3 in Relation to Combating Corporate Bribery: A Case Study of Two Chinese Telecommunications  
4 Companies. Australian Accounting Review.

5 Islam, R. & C. Montenegro. 2002. What Determines the Quality of Institutions? Working  
6 paper.

7 Islam, Roumeen. 2006. does More Transparency Go Along With Better Governance?  
8 Economics & Politics

9 Ismail, A. & K. Rashid. 2014. Time Series Analysis of the Nexus Among Corruption,  
10 Political Instability and Judicial Inefficiency in Pakistan. Quality & Quantity

11 Issacharoff, Samuel. 2010. On Political Corruption. Harvard Law Review

12 Ivanov, Eduard et al. 2014. Legal Regulation of Combating Corruption: Report of the  
13 LSGl's Research Group. (Law Schools Global League Research Paper No. 2.) Ivanov, Kalin. 2007.  
14 "The Limits of a Global Campaign against Corruption", in Sarah Bracking ed., Corruption and  
15 Development: The Anti-Corruption Campaigns (Palgrave Macmillan)

16 Ivanov, Kalin. 2010. The 2007 Accession of Bulgaria and Romania: Ritual and Reality.  
17 Global Crime

18 Ivanyna, Maksym & Anwar Shah. 2011. Decentralization and Corruption: New Cross-  
19 Country Evidence. Environment & Planning C: Government & Policy

20 Ivanyna, Maksym, Alexandros Mournouras & Peter Rangazas. 2015. The Culture of  
21 Corruption, Tax Evasion, and Economic Growth. Empirical Enquiry (forthcoming).

22 Iversen, V. et al. 2006. High Value Forests, Hidden Economies and Elite Capture: Evidence  
23 from Forest User Groups in Nepal's Terai. Ecological Economics

24 Ivkovic, S.K. & T.O. Shelley. 2007. Police Integrity and the Czech Police Officers.  
25 International Journal of Comparative & Applied Criminal Justice

26 Ivkovic, S.K., C.B. Klockars, I. Cajner-Mraovic' & D. Ivanusec. 2002. Controlling Police  
27 Corruption: The Croatian Perspective. Police Practice & Research

28 Ivkovic, S.K., M. Haberfeld & R. Peacock. 2013. Rainless West: The Integrity Survey's  
Role in Agency Accountability. Police Quarterly

Ivkovich, S.K. & A. Sauerman. 2013. Curtailing the Code of Silence among the South  
African Police. Policing: An International Journal of Police Strategies & Management

Ivlevs, Artjoms & T. Hinks. 2015. Bribing Behaviour and Sample Selection: Evidence from  
Post-Socialist Countries and Western Europe. Jahrbucher Fur Nationalokonomie Und Statistik



Ivlevs, Artjoms & Timothy Hinks. 2015. Bribing Behavior and Sample Selection: Evidence from Post-Socialist Countries and Western Europe. *Journal of Economics & Statistics*

Ivlevs, Artjoms & Timothy Hinks. 2015. Global Economic Crisis and Corruption. *Public Choice*

Ivlevs, Artjoms & Timothy Hinks. 2015. Global Economic Crisis and Corruption (correction notice). *Public Choice*

Ivory, Radha. 2013. The Right to a Fair Trial and International Cooperation in Criminal Matters: Article 6 EHCR and the Recovery of Assets in Grand Corruption Cases. *Utrecht Law Review*

Ivory, Radha. 2014. "Transparency and Opacity in the International Legal Framework Against Corruption", in A. Castro, ed., *Buen Gobierno Y Derechos Humanos: Nuevas Perspectivas En El Derecho Publico*. Lima: Pontifica Universidad Catolica del Pero.

Ivory, Radha. 2014. Corruption, Asset Recovery, and the Protection of Property in Public International Law: The Human Rights of Bad Guys. Cambridge: Cambridge University Press.

Iwasaki, Ichiro & Taku Suzuki. 2007. Transition Strategy, Corporate exploitation, and State Capture: An Empirical Analysis of the Former Soviet States. *Communist and Post-Communist Studies*

Iwasaki, Ichiro & Taku Suzuki. 2012. The Determinants of Corruption in Transition Economies. *Economics Letters*

Iyanda, David O. 2012. Corruption: Definitions, Theories and Concepts. *Arabian Journal of Business & Management*

Iyer, Deepa. 2011. Earning a Reputation for Independence: Ghana's Commission on Human Rights and Administrative Justice, 1993-2003. *Innovations for Successful Societies*, Princeton University.

Iyer, Deepa. 2013. Inducing Honesty, Changing Norms: Government Ethics in Brazil, 1995-2004. *Innovations for Successful Societies*, Princeton University.

Jaber-Lopez, Tarek, Aurora Garcia-Gallego, Pandelis Perakakis & Nikolaus Georgantzis. 2014. Physiological and Behavioral Patterns of Corruption. *Frontiers in Behavioral Neuroscience* (published online).

Jackson, G. et al. 2014. Grey Areas: Irresponsible Corporations and Reputational Dynamics. *Socio-Economic Review*

Jackson, J., M. Asif, B. Bradford & M. Zakaria Zakar. 2014. Corruption and Police Legitimacy in Lahore, Pakistan. *British Journal of Criminology* 54(6): 1067-1088.

Jackson, Michael & Rodney Smith. 1996. Inside Moves and Outside Views: An Australian Case Study of Elite and Public Perceptions of Political Corruption. *Governance: An International*

Journal of Policy and Administration

Jackson, Rachel. 2012. *Blowing the Whistle on the Pay-to-Play Game: Campaign Financing Reform in New Jersey, 1998-2012*. Innovations for Successful Societies, Princeton University.

Jacobs, Leslie Gielow & Benjamin B. Wagner. 2007. Limits to the Independent Anti-Corruption Commission Model of Corruption Reform: Lessons from Indonesia. *Pacific McGeorge Global Business & Development Law Journal*

Jacobson, Gary C. & Michael Dimock. 1994. Checking Out: The Effects of Bank Overdrafts on the 1992 House Elections. *American Journal of Political Science*

Jacquemet, Nicolas. 2012. Corruption as Betrayal: experimental Evidence. Working paper.

Jagger, P. & G. Shively. 2015. Taxes and Bribes in Uganda. *Journal of Development Studies*

Jaimovich, E. & J.P. Rud. 2014. Excessive Public Employment and Rent-Seeking Traps.

*Journal of Development Economics* 106: 144-155.

Jain, Arvind K. 2001. Corruption: A Review. *Journal of Economic Surveys*

Jain, Arvind K. 2001. *The Political Economy of Corruption*. London: Routledge.

Jain, Arvind K. 2011. Corruption: Theory, Evidence and Policy. CESifo DICE Report

Jancsics, D. 2015. Imperatives in Informal Organizational Resource Exchange in Central Europe. *Journal of Eurasian Studies*

Jancsics, David & Istvan Javor. 2012. Corrupt Governmental Networks. *International Public Management Journal*

Jancsics, David. 2013. Petty Corruption in Central and Eastern Europe: The Client's Perspective. *Crime, Law & Social Change*

Jancsics, David. 2014. Interdisciplinary Perspectives on Corruption. *Sociology Compass*

Jancsics, David. 2015. "A Friend Gave Me a Phone Number" – Brokerage in Low-Level Corruption. *International Journal of Law, Crime & Justice*

Jancsics, David. 2015. Imperatives in Informal Organizational Resource Exchange in Central Europe. *Journal of Eurasian Studies*

Jang, H., J. Lee & J.C. Gibbs. 2015. The Influence of the National Government on Confidence in the Police: A Focus on Corruption. *Journal of Law, Crime & Justice*.

Jansen, Eirik Gjostein. 2013. "Don't Rock the Boat: Norway's Difficulties in Dealing with Corruption in Development Aid", in Soreide, Tina & Aled Williams eds., *Corruption, Grabbing and Development*.

- 1 Jaquemet, Nicolas. 2007. Corruption as Betrayal: experimental Evidence on Corruption
- 2 Under Delegation. GATE Working Paper 2005-06.
- 3 Jara, Gabriela. 2013. Following on the Foreign Corrupt Practices Act: The Dynamic
- 4 Shareholder Derivative Suit. Duke Law Journal
- 5 Jarso, James Forole. 2010. The Media and the Anti-Corruption Crusade in Kenya: Weighing
- 6 the Achievements, Challenges, and Prospects. American University International Law Review
- 7 Jatto, Lucky Biye, Jr. 2010. Africa's Approach to the International War on Corruption: A
- 8 Critical Appraisal of the African Union Convention on Preventing and Combating Corruption.
- 9 Asper Review of International Business & Trade Law
- 10 Jauregui, Beatrice. 2014. Provisional Agency in India: Jugaad and Legitimation of
- 11 Corruption. American Ethnologist.
- 12 Javor, Istvan & David Jancsics. 2013. The Role of Power in Organizational Corruption: An
- 13 Empirical Study. Administration & Society Online First
- 14 Javorcik, B.S. & G. Narciso. 2008. Differentiated Products and Evasion of Import Tariffs.
- 15 Journal of International Economics
- 16 Javorcik, Beata S. & Shang-Jin Wei. 2009. Corruption and Cross-Border Investment in
- 17 Emerging Markets: Firm-Level Evidence. Journal of International Money & Finance
- 18 Jayawickrama, Nihal, Jeremy Pope & Oliver Stolpe. 2002. Legal Provisions to Facilitate the
- 19 Gathering of Evidence in Corruption Cases: Easing the Burden of Proof. Forum on Crime &
- 20 Society
- 21 Jelloun, Tahar Ben. 1996. Corruption. New Press.
- 22 Jenkins, Rob. 2007. India's Unlikely Democracy: Civil Society Versus Corruption. Journal
- 23 of Democracy
- 24 Jensen, N. & C.-A. Png. 2011. Implementation of the FATF 40+9 Recommendations: A
- 25 Perspective from Developing Countries. Journal of Money Laundering Control
- 26 Jensen, N. & L. Wantchekon. 2004. Resource Wealth and Political Regimes in Africa.
- 27 Comparative Political Studies
- 28 Jensen, N. 2002. Economic Reform, State Capture, and International Investment in
- Transition Economies. Journal of International Development
- Jensen, Nathan M. & Aminur Rahman. 2011. The Silence of Corruption: Identifying
- Underreporting of Business Corruption through Randomized Response Techniques. World Bank
- Policy Research Working Paper
- Jensen, Nathan M. & Aminur Rahman. 2015. "The Silence of Corruption: Identifying

Underreporting of Business Corruption Through Randomised Response Techniques”, , in Paul M. Heywood ed., *The Routledge Handbook of Political Corruption* (New York: Routledge)

Jensen, Nathan M. & Edmund J. Malesky. 2015. does the OECD Anti-Bribery Convention Reduce Bribery? An Empirical Analysis Using the Unmatched Count Technique. Working paper.

Jensen, Nathan M., Quan Li & Aminur Rahman. 2010. Understanding Corruption and Firm Responses in Cross-National Firm-Level Surveys. *Journal of International Business Studies*

Jensen, P.S. & M.K. Justesen. 2014. Poverty and Vote Buying: Survey-Based Evidence from Africa. *Electoral Studies*

Jeong, Gyung-Ho. 2013. Personal Vote-Seeking Incentives of Legislators and Bureaucratic Corruption. Working Paper.

Jeong, Yujin & Robert J. Weiner. 2011. “Conflict and Corruption in International Trade: Who Helped Iraq Circumvent United Nations Sanctions”, in *International Handbook on the Economics of Corruption*, Vol. II. (Edward Elgar Publishing).

Jeong, Yujin & Robert J. Weiner. 2012. Who Bribes? Evidence from the United Nations’ Oil-for-Food Program. *Strategic Management Journal* 1363-1383.

Jerome, Afeikhena, Senyo Adjiboloso & Dipo Busari. 2005. Addressing Oil Related Corruption in Africa: Is the Push for Transparency Enough? Review of Human Factor Studies Special Edition

Jetter, M., A.M. Agudelo & A.R. Hassan. 2015. The Effect of Democracy on Corruption: Income Is Key. *World Development* (forthcoming).

Jeydel, Peter. 2012. Yoking the Bull: How to Make the FCPA Work for U.S. Business. *Georgetown Journal of International Law*

Jiang, T. & H. Nie. 2014. The Stained Chinese Miracle: Corruption, Regulation, and Firm Performance. *Economics Letters*

Jimenez, F. & M. Cainzos. 2003. “Political Corruption in Spain: Perceptions and Problems”, in M.J. Bull & J.L. Newell eds., *Corruption in Contemporary Politics* (London: Macmillan-Palgrave).

Jimenez, Fernando & Miguel Cainzos. 2006. “How Far and Why Do Corruption Scandals Cost Votes?” in John Garrard & James L. Newell eds., *Scandals in Past and Contemporary Politics* (Manchester: Manchester University Press)

Jimenez, Fernando, Monica Garcia-quesada & Manuel Villoria. 2014. Integrity Systems, Values, and expectations: explaining Differences in the Extent of Corruption in Three Spanish Local Governments. *International Journal of Public Administration*

Jimenez, Luis F. 1998. The Inter-American Convention Against Corruption. *Am. Soc. Int’l L. Proceedings*

- 1 Jin, Jongsoon. 2005. Corruption and the Time Horizons of Politicians. Working paper.
- 2 Johnson, Chalmers. 1986. Tanaka Kakuei, Structural Corruption, and the Advent of
- 3 Machine Politics in Japan. *Journal of Japanese Studies*
- 4 Johnson, Jesper & Deborah Hardoon. 2012. Why, When and How to Use the Global
- 5 Corruption Barometer. U4 Brief 2012:5. Bergen, Norway: U4 Anti-Corruption Resource Center.
- 6 Johnsn, Jesper & Phil Mason. 2013. The Proxy Challenge: Why Bespoke Proxy Indicators
- 7 Can Help Solve the Anti-Corruption Measurement Problem. U4 Brief no. 6.
- 8 Johnson, Jesper & Tina Soreide. 2013. Methods for Learning What Works and Why in Anti-
- 9 Corruption. U4 Issue 2013:8. Bergen, Norway: U4 Anti-Corruption Resource Center.
- 10 Johnson, Jesper, Hannes Hechler, Luis De Sousa & Harald Mathisen. 2011. How to Monitor
- 11 and Evaluate Anti-Corruption Agencies: Guidelines for Agencies, Donors, and Evaluators. U4 Issue
- 12 2011:8. Bergen, Norway: U4 Anti-Corruption Resource Center.
- 13 Johnson, Jesper, Nils Taxell & Dominik Zaum. 2012. Mapping Evidence Gaps in Anti-
- 14 Corruption: Assessing the State of the Operationally Relevant Evidence on Donors'
- 15 Actions and Approaches to Reducing Corruption. U4 Issue 2012:7. Bergen, Norway: U4
- 16 Anti-Corruption Resource Center.
- 17 Johnson, Jesper. 2012. Theories of Change in Anti-Corruption Work: A Tool for Programme
- 18 Design and Evaluation (Bergen: Chr. Michelsen Institute, U4 Issue 2012: 6) Johnsn, Jesper. 2014.
- 19 Cost-Effectiveness and Cost-Benefit Analysis of Governance and Anti-Corruption Activities. U4
- 20 Issue no. 10.
- 21 Johnsn, Jesper. 2015. "Corruption – New Strategies" in Barry A.K. Rider, ed., *Handbook*
- 22 *on International Financial Crimes Cheltenham:*
- 23 Johnsn, Jesper. 2015. *Corruption and Stabilisation: Aid Agencies' Anti-corruption*
- 24 *Strategies in Fragile States.* (Edward Elgar, forthcoming).
- 25 Johnson, Joel W. 2015. Presidential Elections and Corruption Perceptions in Latin America.
- 26 *Journal of Politics in Latin Americ*
- 27 Johnson, N.D., C.L. La Fountain & S. Yamarik. 2011. Corruption Is Bad for Growth (Even
- 28 in the United States). *Public Choice*
- Johnson, Noel, W. Ruger, J. Sorens & S. Yamarik. 2014. *Corruption, Regulation, and*
- Growth: An Empirical Study of the United States.* *Economics of Governance*
- Johnson, Omotunde E.G. 1975. *An Economic Analysis of Corrupt Government, With*
- Special Application to Less Developed Countries.* *Kyklos: Int'l Rev. for Soc. Sci.*
- Johnson, Ronald N. & Gary D. Libecap. 1995. *Courts, a Protected Bureaucracy, and*
- Reinventing Government.* *Arizona Law Review*

Johnson, S., P. Boone, A. Breach & E. Friedman. 2000. Corporate Governance in the Asian Financial Crisis, 1997-1998. *Journal of Financial Economics*

Johnson, Simon & Todd Mitton. 2003. Cronyism and Capital Controls: Evidence from Malaysia. *Journal of Financial Economics*

Johnson, Simon, Daniel Kaufmann & Pablo Zoido-Lobatan. 1998. Regulatory Discretion and the Unofficial Economy. *American Economic Review (Papers and Proceedings)*

Johnson, Simon, Daniel Kaufmann, John McMillan & Christopher Woodruff. 2000. Why Do Firms Hide? Bribes and Unofficial Activity after Communism. *Journal of Public Economics*

Johnson, Vincent R. 1999. America's Preoccupation with Ethics in Government. *St. Mary's Law Journal*

Johnston, M. 2007. Understanding the Private Side of Corruption: New Kinds of Transparency, New Roles for Donors. U4 Anti-Corruption Centre Brief No. 6.

Johnston, M. 2015. Making Transparency Real? Accounting and Popular Participation in Corruption Control. *Critical Perspectives on Accounting*

Johnston, Michael & Jesper Johnsen. 2014. Doing the Wrong Things for the Right Reasons?: "Do No Harm" as a Principle of Reform. U4 Brief no. 13.

Johnston, Michael & Sahr J. Kpundeh. 2004. Building a Clean Machine: Anti-Corruption Coalitions and Sustainable Reform. *World Bank Policy Research Working Paper 3466*.

Johnston, Michael & Yufan Hao. 1995. China's Surge of Corruption. *Journal of Democracy*

Johnston, Michael ed. 2005. *Civil Society and Corruption: Mobilizing for Reform*. (Lanham: University Press of America).

Johnston, Michael. 1986. Right and Wrong in American Politics: Popular Conceptions of Corruption. *Polity*

Johnston, Michael. 1986. The Political Consequences of Corruption: A Reassessment. *Comparative Politics*

Johnston, Michael. 1991. Historical Conflict and the Rise of Standards. *Journal of Democracy*

Johnston, Michael. 1996. The Search for Definitions: The Vitality of Politics and the Issue of Corruption. *International Social Science Journal*

Johnston, Michael. 1997. *Political Corruption and Public Policy in America*. Westport: Praeger.

Johnston, Michael. 1998. *Fighting Systemic Corruption: Social Foundations for Institutional*

1 Reform. European Journal of Development Research

2 Johnston, Michael. 1999. "A Brief History of Anticorruption Agencies," in Schedler,  
3 Andreas et al. The Self-Restraining State: Power and Accountability in New Democracies. Boulder:  
Lynne RieGnner Publishers.

4 Johnston, Michael. 2001. "Measuring Corruption: Numbers Versus Knowledge Versus  
5 Understanding", in Arvind K. Jain ed., The Political Economy of Corruption (London: Routledge)

6 Johnston, Michael. 2005. Political Parties and Democracy in Theoretical and Practical  
7 Perspectives. Washington, D.C.: National Democratic Institute for International Development.

8 Johnston, Michael. 2006. Syndromes of Corruption: Wealth, Power, and Democracy.  
Cambridge: Cambridge University Press.

9 Johnston, Michael. 2008. Japan, Korea, the Philippines, China: Four Syndromes of  
10 Corruption. Crime, Law & Social Change

11 Johnston, Michael. 2010. Assessing Vulnerabilities to Corruption. Public Integrity

12 Johnston, Michael. 2010. Political and Social Foundations for Reform: Anti-Corruption  
13 Strategies for the Philippines. Manila: Asian Institute of Management.

14 Johnston, Michael. 2015. "Reflection and Reassessment: The Emerging Agenda of  
15 Corruption Research" , in Paul M. Heywood ed., The Routledge Handbook of Political Corruption  
(New York: Routledge)

16 Jon, Alan Doig & David Watt. 2001. Managing Anti-Corruption Agencies. Forum on Crime  
17 & Society

18 Jones, David S. 2009. Curbing Corruption in Government Procurement in Southeast Asia:  
19 Challenges and Constraints. Asian Journal of Political Science

20 Jordan, Jon. 2011. Recent Developments in the Foreign Corrupt Practices Act and the New  
21 UK Bribery Act: A Global Trend Towards Greater Accountability in the Prevention of Foreign  
Bribery. NYU Journal of Law & Business

22 Jordan, Jon. 2011. The Adequate Procedures Defense Under the UK Bribery Act: A British  
23 Idea for the Foreign Corrupt Practices Act. Stanford Journal of Law, Business & Finance

24 Jordan, Jon. 2011. The OECD's Call for an End to "Corrosive" Facilitation Payments and  
25 the International Focus on the Facilitation Payments Exception Under the Foreign Corrupt Practices  
Act. University of Pennsylvania Journal of Business Law.

26 Jordan, William Chester. 2009. Anti-Corruption Campaigns in Thirteenth-Century Europe.  
27 Journal of Medieval History

28 Jos, Philip H. 1993. Empirical Corruption Research: Beside the (Moral) Point?, Journal of  
Public Administration Research and Theory: J-PART



1 Joseph, Anthony A. 2008. Public Corruption: The Government's expansive View in Pursuit  
2 of Local and State Officials. Cumberland Law Review

3 Josephs, Hilary K. 2000. The Upright and the Low-Down: An Examination of Official  
4 Corruption in the United States and the People's Republic of China. Syracuse Journal of  
5 International Law & Commerce

6 Joutsen, Matti & Adam Graycar. 2012. When experts and Diplomats Agree: Negotiating  
7 Peer Review of the UN Convention Against Corruption. Global Governance

8 Joutsen, Matti. 2012. "The United Nations Convention Against Corruption", in Adam  
9 Graycar & Russell G. Smith eds., Handbook of Global Research and Practice in Corruption

10 Judge, William Q., D. Brian McNatt & Weichu Xu. 2011. The Antecedents and Effects of  
11 National Corruption: A Meta-Analysis. Journal of World Business

12 Jun, Daniel Y. 1996. Bribery Among the Korean Elite: Putting an End to a Cultural Ritual  
13 and Restoring Honor. Vanderbilt Journal of Transnational Law.

14 Jun, Daniel Y. 2000. The Foreign Corrupt Practices Act and Structural Corruption. Boston  
15 University International Law Journal

16 June, Raymond, Afroza Chowdhury, Nathaniel Heller & Jonathan Werve. 2008. A User's  
17 Guide to Measuring Corruption. (Oslo: UNDP Oslo Governance Center).

18 Justesen, Mogens K. & Christian Bjornskov. 2014. exploiting the Poor: Bureaucratic  
19 Corruption and Poverty in Africa. World Development

20 Justesen, Mogens K. 2014. exploiting the Poor: Bureaucratic Corruption and Poverty in  
21 Africa. World Development

22 Kacapyr, E. 2001. Business as Usual: Corruption and Business Activity. Journal of Social,  
23 Political, and Economic Studies

24 Kaczmarek, Sarah C. & Abraham L. Newman. 2011. The Long Arm of the Law:  
25 Extraterritoriality and the National Implementation of Foreign Bribery Legislation. International  
26 Organization

27 Kahan, Daniel M. 1998. Social Meaning and the Economic Analysis of Crime. Journal of  
28 Legal Studies .

Kahana, Nava & Qijun Liu. 2010. Endemic Corruption. European Journal of Political  
Economy

Kahn, E.M. et al. 2001. Performance-Based Wages in Tax Collection: The Brazilian Tax  
Collection Reform and Its Effects. Economic Journal

Kaikati, Jack G., G.M. Sullivan, J.M. Virgo, T.R. Carr & K.S. Virgo. 2000. The Price of



International Business Morality: Twenty Years Under the Foreign Corrupt Practices Act. Journal of Business Ethics

Kam, Christopher. 2007. "Four Lessons about Corruption from Victorian Britain."

Kaminski, A. 1997. Corruption Under the Post-Communist Transformation. Policy Sociology Review

Kaminski, Antoni. 1989. Coercion, Corruption, and Reform: State and Society in the Soviet-Type Socialist Regimes. Journal of Theoretical Politics

Kang, D.C. 2003. Transaction Costs and Crony Capitalism in East Asia. Comparative Politics.

Kang, David C. 2002. Bad Loans to Good Friends: Money Politics and the Developmental State in South Korea. International Organization

Kang, David C. 2002. Crony Capitalism. Cambridge University Press.

Kang, E.T. & B.D. Frey. 2014. The FCPA and the Financial Industry: Understanding and Mitigating Risk. Journal of Taxation & Regulation of Financial Institutions 27(5): 37-44.

Kanol, Direnc. 2015. Pluralism, Corporatism and Perception of Corruption. Journal of Public Affairs

Karahan, G., R.M. Coates & W.F. Shughart II. 2006. Corrupt Political Jurisdictions and Voter Participation. Public Choice

Karalashvili, Nona, Aart Kraay & Peter Murrell. 2015. Doing the Survey Two-Step: The Effects of Reticence on Estimates of Corruption in Two-Stage Survey Questions. World Bank Policy Research Working Paper 7276.

Karhunen, Paivi & Riitta Kosonen. 2013. Strategic Responses of Foreign Subsidiaries to Host Country Corruption: The Case of Finnish Firms in Russia. Critical Perspectives on International Business

Karhunen, Paivi & Svetlana Ledyeva. 2012. Corruption Distance, Anti-Corruption Laws and International Ownership Strategies in Russia. Journal of International Management

Karim, Sabrina. 2011. Madame Officer. Americas Quarterly 5(3): Karklins, Rasma. 2002. Typology of Post-Communist Corruption. Problems of Post-Communism

Karklins, Rasma. 2005. The System Made Me Do It: Corruption in Post-Communist Societies. (Armonk, NY: M.E. Sharpe).

Karl, Terry Lynn. 1997. The Paradox of Plenty: Oil Booms and Petro-States (Berkeley, CA: University of California Press).

Karpaty, Patrik & Patrik Gustavsson Tingvall. 2015. Service Offshoring and Corruption: Do

1 Firms Escape Corrupt Countries? Journal of Industry Competition & Trade (forthcoming).

2 Karpoff, Jonathan M., D. Scott Lee & Gerald S. Martin. 2014. The Economics of Foreign  
3 Bribery: Evidence from FCPA Enforcement Actions. Working paper.

4 Karpoff, Jonathan M., D. Scott Lee & Valaria P. Vondryk. 1999. Defense Procurement  
5 Fraud, Penalties, and Contractor Influence. Journal of Political Economy

6 Kartal, Mart & Jon Pevehouse. 2014. International Institutions and the Rule of Law: The  
7 Case of National Corruption. Working paper.

8 Kartal, Mert. 2014. Accounting for the Bad Apples: The EU's Impact on National  
9 Corruption Before and After Accession. Journal of European Public Policy

10 Kartal, Mert. 2014. The EU's Impact on National Corruption in Central and Eastern Europe:  
11 A Qualitative Comparative Analysis. Working paper.

12 Kartmer, Jennifer & Carolyn M. Warner. 2015. Multi-Nationals and Corruption Systems:  
13 The Case of Siemens. Working paper.

14 Kashem, M.B. 2005. "The Social Organization of Police Corruption: The Case of  
15 Bangladesh", in Rick Sarre, Dilip K. Das & H.J. Albrecht eds., Policing Corruption: International  
16 Perspectives (Lexington Books), pp. 237-246.

17 Kato, A. & T. Sato. 2015. Greasing the Wheels? The Effect of Corruption in Regulated  
18 Manufacturing Sectors of India. Canadian Journal of Development Studies.

19 Kato, Atsushi & Takahiro Sato. 2014. The Effect of Corruption on the Manufacturing Sector  
20 in India. Economics of Governance

21 Katou, A.A. 2014. The Relationship Between Corrupt Practices and Organisational  
22 Performance: An Empirical Investigation. International Journal of Business Governance & Ethics

23 Katsios, Stavros. 2006. The Shadow Economy and Corruption in Greece. South-Eastern  
24 Europe Journal of Economics

25 Kauder, B. & N. Potrafke. 2015. Just Hire Your Spouse! Evidence from a Political Scandal  
26 in Bavaria. European Journal of Political Economy

27 Kauder, Bjorn & Niklas Potrafke. 2014. Just Hire Your Spouse: Empirical Evidence from a  
28 New Type of Political Favoritism. Working paper.

Kaufmann, D. & A. Kraay. 2002. Growth without Governance. *Economia*

Kaufmann, D. & P. Vicente. 2011. Legal Corruption. *Economics & Politics*

Kaufmann, D. 2015. Corruption Matters. *Finance & Development*

Kaufmann, Daniel & Cheryl Grey. 1998. Corruption and Development, Finance and

Development,

Kaufmann, Daniel & Paul Siegelbaum. 1997. Privatization and Corruption in Transition Economies. *Journal of International Affairs*

Kaufmann, Daniel & Shang-Jin Wei. 2000. “does ‘Grease Money’ Speed Up the Wheels of Commerce?” IMF Working Papers 00/64. Washington, D.C.: International Monetary Fund.

Kaufmann, Daniel, Aart Kraay & Massimo Mastruzzi. 2004. Governance Matters III: Governance Indicators for 1996, 1998, 2000, and 2002. *World Bank Economic Review*

Kaufmann, Daniel, Aart Kraay & Massimo Mastruzzi. 2006. “Measuring Governance Using Perceptions Data,” in Susan Rose-Ackerman ed., *International Handbook of Economic Corruption* (Northampton, England: Edward Elgar)

Kaufmann, Daniel, Aart Kraay & Massimo Mastruzzi. 2007. Growth and Governance: A Reply. *Journal of Politics*

Kaufmann, Daniel, Aart Kraay & Massimo Mastruzzi. 2007. The Worldwide Governance Indicators Project: Answering the Critics. *World Bank Policy Research Working Paper* 4149.

Kaufmann, Daniel, Aart Kraay & Massimo Mastruzzi. 2010. The Worldwide Governance Indicators: Methodology and Analytical Issues. (Unpublished working paper).

Kaufmann, Daniel, Gil Mehrez & Tugrul Gurgur. 2002. Voice or Public Sector Management? An Empirical Investigation of Determinants of Public Sector Performance Based on a Survey of Public Officials. Working paper.

Kaufmann, Daniel, Judith Montoriol-Garriga & Francesca Recanatini. 2008. How does Bribery Affect Public Service Delivery? Micro-Evidence from Service Users and Public Officials in Peru. *World Bank Policy Research Working Paper* 4492.

Kaufmann, Daniel. 1997. Corruption: The Facts, *Foreign Policy*, No. 107 (Summer)

Kaufmann, Daniel. 1999. “Anticorruption Strategies: Starting Afresh? Unconventional Lessons from Comparative Analysis”, in R. Staphenurst & S.J. Kpundeh eds., *Curbing Corruption: Towards a Model for Building National Integrity* (Washington, D.C.: World Bank)

Keefer, Philip & Razvan Vlaicu. 2008. Democracy, Credibility, and Clientalism. *Journal of Law, Economics & Organization*

Keefer, Philip & Stephen Knack. 2007. Boondoggles, Rent-Seeking, and Political Checks and Balances: Public Investment Under Unaccountable Governments. *Review of Economics & Statistics*

Keefer, Philip & Stuti Khemani. 2005. Democracy, Public expenditures, and the Poor: Understanding Political Incentives for Providing Public Services. *World Bank Research Observer*

Keefer, Philip & Stuti Khemani. 2011. Mass Media and Public Services: The Effects of

Radio Access on Public Education in Benin. World Bank Policy Research Working Paper 5559.

Keefer, Philip & Stuti Khemani. 2012. Do Informed Citizens Receive More or Pay More? The Impact of Radio on the Government Distribution of Public Health Benefits. World Bank Policy Research Working Paper 5952.

Keefer, Philip. 2007. Clientalism, Credibility and the Policy Choices of Young Democracies. American Journal of Political Science

Keefer, Philip. 2011. Collective Action, Political Parties, and Pro-Development Public Policy. Asian Development Review

Keenan, Patrick J. 2009. Curse or Cure? China, Africa, and the Effects of Unconditioned Wealth. Berkeley Journal of International Law

Keig, D.L., L.E. Brouthers & V.B. Marshall. 2015. Formal and Informal Corruption Environments and Multinational Enterprise Social Irresponsibility. Journal of Management Studies

Keiser, R. 2015. Urban Regime Change: A Silver Lining for Scandals. Urban Affairs Review

Kelley, Thomas. 2012. Corruption as Institution among Small Businesses in Africa.

Florida Journal of International Law

Kelman, Steven. 2002. Remaking Federal Procurement. Public Contract Law Journal

Kelsall, T. 2011. Rethinking the Relationship between Neo-Patrimonialism and Economic Development in Africa. IDS Bulletin 42(2):

Kempf, R. 2015. Crafting Accountability Policy: Designing Offices of Inspector General. Policy & Society 34(2):.

Kennedy, David & Dan Danielsen. 2011. Busting Bribery: Sustaining the Global Momentum of the Foreign Corrupt Practices Act (New York: Open Society Foundation).

Kennedy, David. 1999. The International Anti-Corruption Campaign. Connecticut Journal of International Law

Kennedy, R. & L. Tiede. 2013. Economic Development Assumptions and the Elusive Curse of Oil. International Studies Quarterly

Kenny, C. 2009. Measuring and Reducing Corruption in Infrastructure: Evidence from Transition and Developing Countries. Journal of Development Studies

Kenny, Charles & Maria Musatova. 2011. “‘Red Flags of Corruption’ in World Bank Projects: An Analysis of Infrastructure Projects”, in Susan Rose-Ackerman & Tina Soreide, eds., International Handbook on the Economics of Corruption, Vol. II. (Edward Elgar Publishing).

1 Kenny, Charles & Tina Soreide. 2008. Grand Corruption in Utilities. World Bank Policy  
Research Working Paper 4805.

2 Kenny, Charles, Michael Klein & Monika Sztajerowska. 2011. A Trio of Perspectives on  
3 Corruption, Bias, Speed Money and “Grand Theft Infrastructure”. World Bank Policy Research  
Working Paper 5889.

4 Kenny, Charles. 2006. Measuring and Reducing the Impact of Corruption in Infrastructure.  
5 World Bank Policy Research Working Paper 4099.

6 Kenny, Charles. 2009. Is There an Anticorruption Agenda in Utilities? Utilities Policy 17(2):  
7 156-165.

8 Kenny, P.D. 2015. The Origins of Patronage Politics: State Building, Centrifugalism, and  
9 Decolonization. British Journal of Political Science

10 Kessing, S.G., K.A. Konrad & C. Kotsogiannis. 2007. Foreign Direct Investment and the  
Dark Side of Decentralization. Economic Policy

11 Ketkar, K.W., A. Murtuza & S.L. Ketkar. 2005. Impact of Corruption on Foreign Direct  
12 Investment and Tax Revenues. Journal of Public Budgeting, Accounting & Financial Management

13 Khachatryan, E., S. Kube & B. Vollan. 2015. Mitigating Extortive Corruption?  
14 experimental Evidence. Jahrbucher Fur Nationalokonomie Und Statistik

15 Khair, A., R. Haniffa, M. Hudaib & M. Adb Karim. 2015. Personalisation of Power,  
16 Neoliberalism and the Production of Corruption. Accounting Forum

17 Khakbaz-Poor, N. & S. Zarandi. 2015. The Effect of Electronic Government on the  
18 Administrative Corruption of Employees with an Emphasis on Administrative Violations.

19 International Review of Management & Business Research

20 Khalil, Fahad & Jacques Lawarrée. 2006. Incentives for Corruptible Auditors in the Absence  
21 of Commitment. Journal of Industrial Economics

22 Khalil, Fahad, Jacques Lawarree & Sungho Yun. 2009. Bribery versus Extortion: Allowing  
23 the Lesser of Two Evils. RAND Journal of Economics

24 Khan, Adnan Q., Asim I. Khwaja & Benjamin A. Olken. 2015. Tax Farming Redux:  
experimental Evidence on Performanc Pay for Tax Collectors. Working paper.

25 Khan, M. 2001. “The New Political Economy of Corruption”, in B. Fine, C. Lapavistas & J.  
26 Pincus eds., Development Policy in the Twenty-First Century: Beyond the Washington Consensus  
(London: Routledge).

27 Khan, M.H. & K.S. Jomo. 2000. Rents, Rent-Seeking and Economic Development: Theory  
28 and Evidence in Asia (New York: Cambridge University Press).

1 Khan, M.H. 2012. Governance during Social Transformations: Challenges for Africa. New  
2 Political Economy

3 Khan, Mohammad Mohabbat. 2003. Political and Administrative Corruption: Concepts,  
4 Comparative experiences and the Bangladesh Case. Asian Affairs 25(1): 5-33.

5 Khan, Mushtaq H. 1998. "The Role of Civil Society and Patron-Client Networks in the  
6 Analysis of Corruption", in Corruption and Integrity Improvement Initiatives in Developing  
Countries (New York: UNDP).

7 Khan, Mustaq H. 1996. The Efficiency Implications of Corruption. Journal of International  
8 Development

9 Khan, Mustaq H. 1998. Patron-Client Networks and the Economic Effects of Corruption in  
10 Asia. European Journal of Development Research

11 Khan, Mustaq H. 2004. "Corruption, Governance and Economic Development", in K.S.

12 Jomo & Ben Fine eds., The New Development Economics (London: Zed Press).

13 Khandekar, Aalok & Deepa S. Reddy. 2015. An Indian Summer: Corruption, Class, and the  
14 Lokpal Protests. Journal of Consumer Culture

15 Khandker, Abeer 2015. The Effect of Economic Freedom on Corruption: The Case of South  
16 Asian Countries. International Journal of Economics & Business Research

17 Khemani, Melissa. 2009. Anti-Corruption Commissions in the African State: Burying the  
18 Problem or Addressing the Issue? Working paper.

19 Khemani, Melissa. 2009. The Role of Anti-Corruption Commissions in Changing Cultural  
20 Attitudes toward Corruption and the Rule of Law. Working paper.

21 Khemani, Stuti, Phil Keefer, Rafael Martinez & Ritva Reinikka. 2007. does Delegation of  
22 Fiscal Policy to an Independent Agency Make a Difference? Evidence from Intergovernmental  
23 Transfers in India. Journal of Development Economics

24 Khemani, Stuti. 2007. "Can Information Campaigns Overcome Political Obstacles to  
25 Serving the Poor?" in Shanta Devearajan & Ingrid Widlund eds., The Politics of Public Service  
26 Delivery in Democracies: Better Access for the Poor (Ministry of Foreign Affairs, Sweden).

27 Khemani, Stuti. 2007. Local Government Accountability for Health Service Delivery in  
28 Nigeria. Journal of African Economics

29 Khemani, Stuti. 2010. Political Capture of Decentralization: Vote-Buying through Grants-  
30 Financed Local Jurisdictions. World Bank Policy Research Working Paper WPS

31 Khemani, Stuti. 2013. Buying Votes vs. Supplying Public Services: Political Incentives to  
32 Under-Invest in Pro-Poor Policies. World Bank Policy Research Working Paper WPS

1 Khera, R. 2011. India's Public Distribution System: Utilisation and Impact. Journal of  
2 Development Studie

3 Khera, Reetika. 2011. Trends in Division of PDS Grain. Working paper.

4 Khojastehpour, M. 2015. How does Corproate Social Responsibility Avoid the Incidence of  
5 Corruption in International expansion? European Business Review

6 Khumawala, S. & L. Ramchand. 2005. Country Level Corruption and Frequency of Issue in  
7 the U.S. Market. Journal of Public Budgeting, Accounting & Financial Management

8 Khwaja, Asim Ijaz & Atif Mian. 2011. Rent Seeking and Corruption in Financial Markets.  
Annual Review of Economic

9 Khwaja, Asim Ijaz. & Atif Mian. 2005. Do Lenders Favor Politically Connected Firms?  
10 Rent Provision in an Emerging Financial Market. Quarterly Journal of Economics

11 Khwaja, Asim Ijaz. 2009. Can Good Projects Succeed in Bad Communities? Journal of  
12 Public Economics

13 Killingsworth, J.R., N. Hossain, Y Hendrick-Wong, S.D. Thomas, A. Rahman & T.  
14 Begnum. 1999. Unofficial Fees in Bangladesh: Price, Equity, and Institutional Issues. Health Policy  
& Planning

15 Kim, C.K. 2007. A Cross-National Analysis of Global E-Government. Public Organization  
16 Review

17 Kim, Chon-Kyun. 2014. Anti-Corruption Initiatives and E-Government: A Cross-National  
18 Study. Public Organization Review

19 Kim, Hun Joon & J.C. Sharman. 2014. Accounts and Accountability: Corruption, Human  
Rights and Individual Accountability Norms. International Organization

20 Kim, Jong Bum. 2000. Korean Implementation of the OECD Bribery Convention:  
21 Implications for Global Efforts to Fight Corruption. UCLA Pacific Basin Law Journal

22 Kim, Joongi & Jong Bum Kim. 1999. Cultural Differences in the Crusade Against  
23 International Bribery: Rice-Cake expenses in Korea and the Foreign Corrupt Practices Act. Pacific  
Rim Law & Policy Journal

24 Kim, Pan Suk. 2007. Building National Integrity Through Corruption Eradication in South  
25 Korea. International Public Management Review

26 Kim, Seongcheol, Hyun Jeong Kim & Heejin Lee et al. 2009. An Institutional Analysis of  
27 an E-Government System for Anti-Corruption: The Case of OPEN. Government Information  
Quarterly

28 Kimbro, M.B. 2002. A Cross-Country Empirical Investigation of Corruption and Its



Relationship to Economic, Cultural, and Monitoring Institutions: An Examination of the Role of Accounting and Financial Statements Quality. *Journal of Accounting, Auditing & Finance*

Kingston, Christopher. 2007. Parochial Corruption. *Journal of Economic Behavior & Organization*

Kingston, Christopher. 2008. Social Structure and Cultures of Corruption. *Journal of Economic Behavior & Organization*

Kinley, David. 2014. A New Human Right to Freedom from Corruption. *Sydney Law School Research Paper No. 14/12*.

Kinnear, James W. 1995. The Ethics of International Business: Foreign Policy and Economic Sanctions. *Vital Speeches*

Kiselev, Eugene. 2012. Bribe-Taking and Bureaucratic Competition: A Search Cost Model of Corruption. Working paper.

Kishore, A. & S. Chakrabarti. 2015. Is More Inclusive More Effective? The “New Style” Public Distribution System in India. *Food Policy*

Kis-Katos, Krisztina & Guenther G. Schulze. 2013. Corruption in Southeast Asia: A Survey of Recent Research. *Asian-Pacific Economic Literature*

Kisubi, M. 1999. Involving Civil Society in the Fight Against Corruption, in R. Stepenhurst & S.J. Kpundeh eds., *Curbing Corruption: Toward a Model for Building National Integrity* (Washington, D.C.: World Bank)

Kjaer, A. 2004. Old Brooms Can Sweep Too! An Overview of Rulers and Public Sector Reform in Uganda, Tanzania and Kenya. *Journal of Modern African Studies*

Kjellberg, Francesco. 1992. Corruption as an Analytical Problem: Some Notes on Research in Public Corruption. *Indian Journal of Social & Administrative Science*

Kjellberg, Francesco. 1995. Conflict of Interest, Corruption or (Simply) Scandals? The “Oslo Case” 1989-1991. *Crime, Law & Social Change*

Klasnja, M. 2015. Corruption and the Incumbency Advantage: Theory and Evidence. *Journal of Politics*

Klasnja, Marko, Joshua Tucker & Kevin Deegan-Krause. 2012. *Pocketbook v. Sociotropic Corruption Voting*.

Klasnja, Marko. 2011. Why Do Malfeasant Politicians Maintain Public Support? Testing the “Uninformed Voter” Argument. (Working paper).

Klaw, Bruce W. 2012. A New Strategy for Preventing Bribery and Extortion in International Business Transactions. *Harvard Journal on Legislation*



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- 1 Kleiman, Mark & Beau Kilmer. 2009. The Dynamics of Deterrence. Proceedings of the  
National Academy of Sciences of the United States.
- 2
- 3 Klein Haarhuis, Carolien M. & Frans L. Leeuw. 2004. Fighting Governmental Corruption:  
The New World Bank Programme Evaluated. Journal of International Development.
- 4 Klein Haarhuis, Carolien M. & Rene Torenvlied. 2006. Dimensions and Alignments in the  
5 African Anti-Corruption Debate. Acta Politica
- 6 Klein Haarhuis, Carolien Maria. 2005. Promoting Anti-Corruption Reforms: Evaluating the  
Implementation of a World Bank Anti-Corruption Program in Seven African Countries
- 7
- 8 Klein, Charles B. 1999. What Exactly Is an Unlawful Gratuity After United States v. Sun-  
Diamond Growers? George Washington Law Review
- 9 Kleinberg, Jeffrey. 2014. The Dynamics of Corruptogenic Organizations. International  
10 Journal of Group Psychotherapy.
- 11 Kleven, Henrik J., Martin B. Knudsen, Claus T. Kreiner, Soren Pederkuris. 2010.
- 12 Unwilling or Unable to Cheat? Evidence from a Randomized Tax Audit experiment in  
13 Denmark. (working paper)
- 14 Klich, Agnieszka. 1996. Bribery in Economies in Transition: The Foreign Corrupt Practices  
Act. Stanford Journal of International Law
- 15
- 16 Klitgaard, R., J. Fedderke & K. Akramov. 2005. "Choosing and Using Performance  
Criteria", in R. Klitgaard & P. Light eds., High Performance Government: Structure, Leadership,  
17 Incentives (Santa Monica, CA: Rand Corporation).
- 18 Klitgaard, Robert 1988. Controlling Corruption. Berkeley, Calif.: Univ. of California Press.
- 19 Klitgaard, Robert et al. 2000. Corrupt Cities: A Practical Guide to Cure and  
20 Prevention.Oakland: Institute for Contemporary Studies.
- 21 Klitgaard, Robert. 1997. Cleaning Up and Invigorating the Civil Service. Public  
Administration & Development
- 22 Klitgaard, Robert. 2006. Subverting Corruption. Global Crime
- 23 Klitgaard, Robert. 2011. Fighting Corruption. CESifo DICE Report
- 24
- 25 Klochko, M. & P. Ordeshook. 2003. Corruption, Cooperation and Endogenous Time  
Discount Rates. Public Choice
- 26
- 27 Klockars, C.B., S.K. Ivkovich, W.E. Harver & M.R. Habersfeld. 2005. The Measurement of  
Police Integrity. (Washington, DC: National Institute of Justice).
- 28 Klomp, Jeroen & Jakob de Haan. 2008. Effects of Governance on Health: A Cross-National

1 Analysis of 101 Countries. Kyklos

2 Klugman, Jeffry. 1986. The Psychology of Soviet Corruption, Indiscipline, and Resistance  
3 to Reform. Political Psychology

4 Knack, Stephen & Aminur Rahman. 2007. Donor Fragmentation and Bureaucratic Quality  
5 in Aid Recipients. Journal of Development Economics

6 Knack, Stephen & Omar Azfar. 2003. Trade Intensity, Country Size and Corruption.  
7 Economics of Governance

8 Knack, Stephen. 2001. Aid Dependence and the Quality of Governance: Cross-Country  
9 Empirical Tests. Southern Economic Journal

10 Knack, Stephen. 2004. does Foreign Aid Promote Democracy? International Studies  
11 Quarterly 48(1): 251-266.

12 Knack, Stephen. 2007. Measuring Corruption: A Critique of Indicators in Eastern Europe  
13 and Central Asia. Journal of Public Policy

14 Knack, Steven. 2009. Sovereign Rents and Quality of Tax Policy and Administration.  
15 Journal of Comparative Economics

16 Knox, Colin. 2009. Dealing with Sectoral Corruption in Bangladesh: Developing Citizen  
17 Involvement. Public Administration & Development

18 Ko, E., Y. Su & C. Yu. 2015. Sibling Rivalry among Anti-Corruption Agencies in Taiwan.  
19 Asian Education & Development Studies

20 Ko, Kilkon & Anaya Samajdar. 2010. Evaluation of International Corruption Indexes:  
21 Should We Believe Them or Not? Social Science Journal

22 Kobis, N. J. Prooijen, F. Righetti & A. Lange. 2015. “Who doesn’t?”—The Impact of  
23 Descriptive Norms on Corruption.

24 Koch, Rebecca. 2005. The Foreign Corrupt Practices Act: It’s Time to Cut Back the Grease  
25 and Add Some Guidance. Boston College International & Comparative Law Review

26 Kochan, Nick & Robin Goodyear. 2011. Corruption: The Corporate Challenge. London:  
27 Palgrave.

28 Kock, Ned & Lebrían Gaskins. 2014. The Mediating Role of Voice and Accountability in  
the Relationship between Internet Diffusion and Government Corruption in Latin America and Sub-  
Saharan Africa. Information Technology for Development

Koechlin, Lucy. 2013. Corruption as an Empty Signifier: Politics and Political Order in  
Africa. Leiden: Koninklijke Brill.

Koehler, Mike. 2007. The Unique FCPA Compliance Challenges of Doing Business in  
China. Wisconsin International Law Journal

1 Koehler, Mike. 2010. The Façade of FCPA Enforcement. Georgetown Journal of  
2 International Law.

3 Koehler, Mike. 2010. The FCPA, Foreign Agents, and Lessons from the Halliburton  
4 Enforcement Action. Ohio Northern University Law Review

5 Koehler, Mike. 2010. The Foreign Corrupt Practices Act in the Ultimate Year of its Decade  
6 of Resurgence. Indiana Law Review

7 Koehler, Mike. 2011. Big, Bold, and Bizarre: The Foreign Corrupt Practices Act Enters a  
8 New Era. University of Toledo Law Review

9 Koehler, Mike. 2012. Revisiting a Foreign Corrupt Practices Act Compliance  
10 Defense. Wisconsin Law Review 2012

11 Koehler, Mike. 2012. The Foreign Corrupt Practices Act Under the Microscope. University  
12 of Pennsylvania Journal of Business Law

13 Koehler, Mike. 2012. The Story of the Foreign Corrupt Practices Act. Ohio State Law  
14 Journal

15 Koehler, Mike. 2013. An Examination of Foreign Corrupt Practices Act Issues. Richmond  
16 Journal of Global Law & Business.

17 Koehler, Mike. 2015. A Snapshot of the Foreign Corrupt Practices Act. Santa Clara Journal  
18 of International Law

19 Koehler, Mike. 2015. The Uncomfortable Truths and Double Standards of Bribery  
20 Enforcement. Fordham Law Review .

21 Koessler, F. & A. Lambert-Mogiliansky. 2014. Extortion and Political-Risk Insurance.  
22 Journal of Public Economics

23 Koessler, Frederic & Ariane Lambert-Mogiliansky. 2013. Committing to Transparency to  
24 Resist Corruption. Journal of Development Economics

25 Kofele-Kale, Ndiva. 1995. Patrimonicide: The International Economic Crime of Indigenous  
26 Spoliation. Vanderbilt Journal of Transnational Law

27 Kofele-Kale, Ndiva. 2000. The Right to a Corruption-Free Society as an Individual and  
28 Collective Human Right: Elevating Official Corruption to a Crime under International Law.  
International Lawyer.

Kofele-Kale, Ndiva. 2006. Change or the Illusion of Change: The War Against Official  
Corruption in Africa. George Washington International Law Review

Kofele-Kale, Ndiva. 2006. Presumed Guilty: Balancing Competing Rights and Interests in  
Combating Economic Crimes. International Law 40: 909-944.

1 Kolenda, Helena. 1990. One Party, Two Systems: Corruption in the People's Republic of  
2 China and Attempts to Control It. *Journal of Chinese Law*

3 Kolstad, Ivar & Arne Wiig. 2009. Is Transparency the Key to Reducing Corruption in  
4 Resource-Rich Countries? *World Development*

5 Kolstad, Ivar & Arne Wiig. 2011. does Democracy Reduce Corruption? CMI Working  
6 Paper 4.

7 Kolstad, Ivar & Odd-Helge Fjeldstad. 2006. Fiscal Decentralisation and Corruption – A  
8 Brief Overview of the Issues. (Bergen: Chr. Michelsen Institute, U4 Issue 2006: 3).

9 Kolstad, Ivar & Tina Soreide. 2009. Corruption in Natural Resource Management:  
10 Implications for Policy Makers. *Resources Policy*

11 Kolstad, Ivar. 2009. The Resource Curse: Which Institutions Matter? *Applied Economics*  
12 *Letters*

13 Komalasari, K. & D. Saripudin. 2015. Integration of Anti-Corruption Education in School's  
14 Activities. *American Journal of Applied Sciences*

15 Kong, D.T. 2014. An Economic-Genetic Theory of Corporate Corruption Across Cultures:  
16 An Interactive Effect of Wealth and the 5HTTLPR-SS/SL Frequency on Corporate Corruption  
17 Mediated by Cultural Endorsement of Self-Protective Leadership. *Personality & Individual*  
18 *Differences*

19 Konrad, K.A. & S. Skaperdas. 1997. Credible Threats in Extortion. *Journal of Economic*  
20 *Behavior & Organization*

21 Konrad, K.A. & S. Skaperdas. 1998. Extortion. *Economica*

22 Konstantinidis, Iannis & Georgios Xezonakis. 2013. Sources of Tolerance towards  
23 Corrupted Politicians in Greece: The Role of Trade Offs and Individual Benefits. *Crime, Law &*  
24 *Social Change*

25 Kornai, Janos. 2000. Hidden in an Envelope: Gratitude Payments to Medical Doctors in  
26 Hungary..

27 Kosack, Stephen & Jennifer Tobin. 2006. Funding Self-Sustaining Development: The Role  
28 of Aid, FDI and Government in Economic Success. *International Organization*

Kosals, L. & A. Maksimova. 2015. Informality, Crime and Corruption in Russia: A Review  
of Recent Literature. *Theoretical Criminology*

Kostadinova, Tatiana. 2009. Abstain or Rebel: Corruption Perceptions and Voting in East  
European Elections. *Politics & Policy*

Kotera, G., K. Okada & S. Samreth. 2012. Government Size, Democracy, and Corruption:

An Empirical Investigation. Economic Modelling

Kotowski, M. & S. Rachmilevitch. 2014. Bribing in First-Price Auctions. Games & Economic Behavior

Kotz, H.D. & S. Mangiero. 2014. Avoiding FCPA Liability by Tightening Internal Controls: Considerations for Institutional Investors and Corporate Counsel. Working paper.

Kotzian, P. 2014. Good Governance and Norms of Citizenship: An Investigation into the System- and Individual-Level Determinants of Attachment to Civic Norms. American Journal of Economics & Sociology

Koyuncu, C. & R. Yilmaz. 2009. The Impact of Corruption on Deforestation: Cross-Country Evidence. Journal of Developing Areas

Kpundeh, S. 2004. "Process Interventions versus Structural Reforms: Institutionalizing Anticorruption Reforms in Africa," in Building State Capacity in Africa: New Approaches

Kpundeh, Sahr J. 1998. "Political Will in Fighting Corruption," in Sahr J. Kpundeh & Irene Hors eds., Corruption and Integrity Improvement Initiatives in Developing Countries (Paris: UNDP/OECD)

Kpundeh, Sahr John. 1995. Politics and Corruption in Africa: A Case Study of Sierra Leone.

Kraay, Aart & Peter Murrell. 2013. Misunderestimating Corruption. World Bank Policy Research Working Paper 6488.

Krajcova, Jana & Andreas Ortmann. 2008. Testing Leniency Programs experimentally: The Impact of "Natural" Framing. CERGE-EI Working Paper No. 372.

Krajcova, Jana. 2008. Testing Leniency Programs experimentally: The Impact of a Change in Parameterization. CERGE-EI Working Paper No. 370.

Krajcova, Jana. 2010. On the Hidden Costs of Monitoring Corruption or Effort. Working Paper.

Krambia-Kapardias, M. 2014. Perception of Political Corruption as a Function of Legislation. Journal of Financial Crime

Kramer, John. 1998. The Politics of Corruption. Current History

Krastev, Ivan & Gregory Ganev. 2003. Do Uncorrupt Governments in Corrupt Countries Have Incentives to Launch Anticorruption Campaigns? East European Constitutional Review

Krastev, Ivan. 2004. "The Missing Incentive: Corruption, Anticorruption, and Reelection", in Janos Kornai & Susan Rose-Ackerman eds., Building a Trustworthy State in Transition. (Palgrave Macmillan)

Krause, Stefen & Fabio Mendez. 2009. Corruption and Elections: An Empirical Study for a

Cross-Section of Countries. Economics & Politics

Krawiec, Kimberly D. 2003. Cosmetic Compliance and the Failure of Negotiated Governance. Washington University Law Quarterly .

Kreindler, Richard. 2011. “Legal Consequences of Corruption in International Investment Arbitration: An Old Challenge with New Answers”, in Laurent Levy & Yves Derains eds., *Liber Amicorum en l’honneur de Serge Lazareff* (Paris: Editions Pedone)

Kress, Laura E. 2009. How the Sarbanes-Oxley Act has Knocked the “SOX” of the DOJ and SEC and Kept the FCPA on Its Feet. University of Pittsburg Journal of Technology, Law & Policy

Krever, Tor. 2007. Curbing Corruption? The Efficacy of the Foreign Corrupt Practices Act. North Carolina Journal of International Law & Commercial Regulation

Kriendler, Richard. 2010. “Corruption in International Investment Arbitration: Jurisdiction and the Unclean Hands Doctrine”, in Kaj Holber et al. eds., *Between East and West: Essays in Honor of Ulf Franke*.

Krishnan, S., T.S.H. Teo & V.K.G. Lim. 2013. Examining the Relationships Among e-Government Maturity, Corruption, Economic Prsperity and Environmental Degradation: A Cross-Country Analysis. Information & Management

Kristiansen, Stein & Muhid Ramli. 2006. Buying an Income: The Market for Civil Service Positions in Indonesia. Contemporary Southeast Asia: Journal of International & Strategic Affairs

Kristiansen, Stein & Pratikno. 2006. Decentralising Education in Indonesia. International Journal of Educational Development

Krueger, Ann. 1974. The Political Economy of the Rent-Seeking Society. American Economic Review

Kruk, M.S., G. Mbaruku, P.C. Rockers & S. Galea. 2008. User Fee Exemptions Are Not Enough: Out of Pocket Paymkents for “Free” Delivery Services in Rural Tanzania. Tropical Medicine & International Health .

Kselman, Daniel. 2011. “Electoral Institutions and Poltical Corruption: Ballot Structure, Electoral Formula, and Graft”, in Norman Schofield ed., *Political Economy of Institutions, Democracy, and Voting* (London: Springer)

Kubiciel, Michael. 2009. Core Criminal Law Provisions in the United Nations Convention Against Corruption. International Criminal Law Review

Kugler, Maurice, Thierry Verdier & Yves Zenou. 2005. Organized Crime, Corruption and Punishment. Journal of Public Economics

Kukhianidze, Alexandre. 2009. Corruption and Organized Crime Before and After the Rose Revolution. Central Asian Survey

1 Kulkarni, Sagar A. 2013. Enforcing Anti-Corruption Measures Through International  
Investment Arbitration. Transnational Dispute Management

2 Kumar, C. Raj. 2003. Corruption and Human Rights: Promoting Transparency in  
3 Governance and the Fundamental Right to Corruption-Free Service in India. Columbia Journal of  
Asian Law

4 Kumar, C. Raj. 2004. Corruption in Japan—Institutionalizing the Right to Information,  
5 Transparency, and the Right to Corruption Free Governance. New England Journal of International  
6 & Comparative Law

7 Kumar, C. Raj. 2004. Human Rights Approaches of Corruption Control Mechanisms:  
8 Enhancing the Hong Kong experience of Corruption Prevention Strategies. San Diego International  
Law Journal

9 Kumar, C. Raj. 2005. Corruption, Human Rights, and Development: Sovereignty and State  
10 Capacity to Promote Good Governance. American Society of International Law Proceedings

11 Kumar, C. Raj. 2008. Corruption, Development and Good Governance: Challenges for  
12 Promoting Access to Justice in Asia. Michigan State Journal of International Law

13 Kumar, C. Raj. 2011. Corruption and Human Rights in India: Comparative Perspectives on  
Transparency and Good Governance (Oxford University Press).

14 Kumar, C. Raj. 2012. Challenges of Corruption and Good Governance: A Human Rights  
15 Perspective. Jindal Journal of Public Policy

16 Kumar, R. & M. Best. 2006. Impact and Sustainability of E-Government Services in  
17 Developing Countries: Lessons Learned from Tamil Nadu, India. The Information Society

18 Kumlin, Staffan & Peter Esaiasson. 2012. Scandal Fatigue? Scandal, Elections and  
19 Satisfaction with Democracy in Western Europe, 1977-2007. British Journal of Political Science.

20 Kuncoro, Ari. 2002. The New Laws of Decentralization and Corruption in Indonesia:  
Examination of Provincial and District Data. Working Paper.

21 Kuncoro, Ari. 2004. Bribery in Indonesia: Some Evidence from Micro-Level Data. Bulletin  
22 of Indonesian Economic Studies

23 Kunicová, Jana & Susan Rose-Ackerman. 2005. Electoral Rules and Constitutional  
24 Structures as Constraints on Corruption. British Journal of Political Science

25 Kunicova, Jana. 2013. “The Role of the World Bank in Promoting Good Governance and  
26 Anti-Corruption Reforms: A View from the Europe and Central Asia Region”, in Susan Rose-  
Ackerman & Paul D. Carrington eds., Anti-Corruption Policy: Can International Actors Play a  
27 Constructive Role? (Durham: Carolina Academic Press)

28 Kupatadze, A. 2015. Political Corruption in Eurasia: Understanding Collusion Between  
States, Organized Crime and Business. Theoretical Criminology 19(2): 198-215.



- 1 Kurer, Oskar. 1993. Clientelism, Corruption, and the Allocation of Resources. Public Choice
- 2 Kurer, Oskar. 2001. "Why Do Voters Support Corrupt Politicians?", in Arvind K. Jain ed.,
- 3 The Political Economy of Corruption (New York: Routledge)
- 4 Kurer, Oskar. 2005. Corruption: An Alternative Approach to Definition and Measurement.
- 5 Political Studies .
- 6 Kurer, Oskar. 2015. "Definitions of Corruption" , in Paul M. Heywood ed., The Routledge
- 7 Handbook of Political Corruption (New York: Routledge)
- 8 Kuris, Gabriel. 2012. "Inviting a Tiger into Your Home": Indonesia Creates an Anti-
- 9 Corruption Commission with Teeth, 2002-2007. Innovations for Successful Societies, Princeton
- 10 University.
- 11 Kuris, Gabriel. 2012. Balancing Responsibilities: Evolution of Lithuania's Anti-Corruption
- 12 Agency, 1997-2007. Innovations for Successful Societies, Princeton University.
- 13 Kuris, Gabriel. 2012. Holding the High Ground with Public Support: Indonesia's Anti-
- 14 Corruption Commission Digs In, 2007-2011. Innovations for Successful Societies, Princeton
- 15 University.
- 16 Kuris, Gabriel. 2012. Surmounting State Capture: Latvia's Anti-Corruption Agency Spurs
- 17 Reforms, 2002-2011. Innovations for Successful Societies, Princeton University.
- 18 Kuris, Gabriel. 2013 Managing Corruption Risks: Botswana Builds an Anti-Graft Agency,
- 19 1994-2012. Innovations for Successful Societies, Princeton University.
- 20 Kuris, Gabriel. 2013. Cleaning House: Croatia Mops Up High-Level Corruption.
- 21 Innovations for Successful Societies, Princeton University.
- 22 Kuris, Gabriel. 2013. From a Rocky Start to Regional Leadership: Mauritius's Anti-
- 23 Corruption Agency, 2006-2012. Innovations for Successful Societies, Princeton University.
- 24 Kuris, Gabriel. 2013. Toothless but Forceful: Slovenia's Anti-Corruption Watchdog exposes
- 25 Systemic Graft, 2004-2013. Innovations for Successful Societies, Princeton University.
- 26 Kuris, Gabriel. 2014. From Underdogs to Watchdogs: How Anti-Corruption Agencies Can
- 27 Hold Off Potent Adversaries. Innovations for Successful Societies, Princeton University.
- 28 Kuris, Gabriel. 2015. Watchdogs or Guard Dogs: Do Anti-Corruption Agencies Need Strong
- Teeth? Policy & Society
- Kurland, Adam H. 1989. The Guarantee Clause as a Basis for Federal Prosecutions of State
- and Local Officials. Southern California Law Review
- Kurtoglu Eskisar, G.M. & A. Komsuoglu. 2015. A Critical Assessment of the
- Transformative Power of EU Reforms on Reducing Corruption in the Balkans. Southeast European



& Black Sea Studies.

Kurtz, Marcus J. & Andrew Schrank. 2007. Growth and Governance: Models, Measures, and Mechanisms. *Journal of Politics*

Kurtzman, Joel, Glenn Yago & Triphon Phumiwasana. 2004. The Global Costs of Opacity —Measuring Business and Investment Risk Worldwide. *MIT Sloan Management Review*

Kurzban, Robert. 2010. Why Everyone (Else) Is a Hypocrite: Evolution and the Modular Mind (Princeton, NJ: Princeton University Press).

Kutnjak-Ivkovic, Sanja. 2003. To Serve and Collect: Measuring Police Corruption. *Journal of Criminal Law & Criminology*

Kutnjak-Ivkovic, Sanja. 2005. Fallen Blue Knights: Controlling Police Corruption.

Kuziemko, Ilyana & Eric Werker. 2006. How Much Is a Seat on the Security Council Worth? Foreign Aid and Bribery at the United Nations. *Journal of Political Economy*

Kuzmina, O., N. Volchkova & T. Zueva. 2014. Foreign Direct Investment and Governance Quality in Russia. *Journal of Comparative Economics*

Kwok, Chuck C.Y. & Solomon Tadesse. 2006. The MNC as an Agent of Change for Host-Country Institutions: FDI and Corruption. *Journal of International Business Studies*

Kwon, I. 2014. Motivation, Discretion, and Corruption. *Journal of Public Administration Research & Theory*

Kyriacou, A.P. & O. Roca-Sagales. 2011. Fiscal Decentralization and Government Quality in the OECD. *Economics Letters*

La Porta, Rafael, Florencio Lopez-de-Silanes, Andrei Shleifer & Robert Vishny. 1999.

The Quality of Government. *Journal of Law, Economics & Organization*

Lacey, Kathleen A. & Barbara Crutchfield George. 1998. expansion of SEC Authority into Internal Corporate Governance: The Accounting Provisions of the Foreign Corrupt Practices Act (A Twentieth Anniversary Review). *Journal of Transnational Law & Policy*

Ladd, Alyssa. 2014. The “Catch-22” of Corporate Cooperation in Foreign Corrupt Practices Act Investigations. *Houston Law Review*

Laffont, Jean-Jacques & Jean Tirole. 1991. The Politics of Regulatory Decision Making: A Theory of Regulatory Capture. *Quarterly Journal of Economics*

Laffont, Jean-Jacques & Mathieu Meleu. 2001. Separation of Powers and Development. *Journal of Development Economics*

Laffont, Jean-Jacques & Tchetché N’Guessan. 1999. Competition and Corruption in an

1 Agency Relationship. Journal of Development Economics

2 Laffont, J-J. & D. Martimort. 1999. Separation of Regulators Against Collusive Behavior.  
3 RAND Journal of Economics

4 Lagos, M. 2003. "Public Opinion of Corruption in Latin America", in Transparency  
5 International, Global Corruption Report 2002 (London: Profile Books)

6 Lagunes, Paul & Rongyao Huang. 2014. Saving Gotham: Fighting Corruption in New  
7 York's Property Tax System. Working paper.

8 Lagunes, Paul & Rongyao Huang. 2015. "Saving Gotham: Fighting Corruption in New York  
9 City's Property Tax System", in Susan Rose-Ackerman & Paul Lagunes eds., Greed, Corruption,  
10 and the Modern State

11 Lahiri, S. & P. Raimondos-Moller. 2000. Lobbying by Ethnic Groups and Aid Allocation.  
12 Economic Journal

13 Lai, Alan. 2002. Building Public Confidence in Anti-Corruption Efforts: The Approach of  
14 the Hong Kong Special Administrative Region of China. Forum on Crime & Society

15 Lalountas, Dionisios, George A. Manolas & Ioannis S. Vavouras. 2011. Corruption,  
16 Globalization and Development: How Are These Three Phenomena Related? Journal of Policy  
17 Modeling

18 Lambert-Mogiliansky, A. 2015. Social Accountability to Contain Corruption. Journal of  
19 Development Economics.

20 Lambert-Mogiliansky, Araine, Mukul Majumdar & Roy Radner. 2008. Petty Corruption: A  
21 Game-Theoretic Approach. International Journal of Economic Theor

22 Lambert-Mogiliansky, Ariane & Konstantin Sonin. 2006. Collusive Market Sharing and  
23 Corruption in Procurement. Journal of Economics & Management Strategy

24 Lambert-Mogiliansky, Ariane, Mukul Majumdar & Roy Radner. 2007. Strategic Analysis of  
25 Petty Corruption: Entrepreneurs and Bureaucrats. Journal of Development Economics

26 Lambert-Mogiliansky, Ariane, Mukul Majumdar & Roy Radner. 2009. Strategic Analysis of  
27 Petty Corruption with an Intermediary. Review of Economic Design

28 Lambert-Mogiliansky, Ariane. 2002. Why Firms Pay Occasional Bribes: The Connection  
Economy. European Journal of Political Economy

Lambert-Mogiliansky, Ariane. 2011. "Corruption and Collusion: Strategic Complements in  
Procurement", in International Handbook on the Economics of Corruption, Vol. II.

Lambsdorf, Johann et al, eds. 2004. Corruption and the New Institutional Economics. New  
York: Routledge.

Pg 1673 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Lambsdorff, Johan Graf. 2012. “Behavioral and experimental Economics as a Guide to Anticorruption”, in S. Serra & L. Wantchekon eds., New Advances in experimental Research on Corruption. Research in experimental Economics, Vol. 15.

Lambsdorff, Johan Graff. 2010. Deterrence and Constrained Enforcement – Alternative Regimes to Deal with Bribery. Working Paper.

Lambsdorff, Johann Graf & Bjorn Frank. 2010. Bribing versus Gift-Giving – An experiment. Journal of Economic Psychology

Lambsdorff, Johann Graf & Bjorn Frank. 2011. Corrupt Reciprocity – experimental Evidence on a Men’s Game. International Review of Law & Economics

Lambsdorff, Johann Graf & H. Fink. 2006 Combating Corruption in Columbia: Perceptions and Achievements. Working Paper.

Lambsdorff, Johann Graf & Mathias Nell. 2007. Fighting Corruption with Asymmetric Penalties and Leniency. Working Paper.

Lambsdorff, Johann Graf. 1998. An Empirical Investigation of Bribery in International Trade. European Journal of Development Research

Lambsdorff, Johann Graf. 2001. How Precise Are Perceived Levels of Corruption? (Transparency International, Background Paper to the 2001 Corruption Perceptions Index).

Lambsdorff, Johann Graf. 2002a. “What Nurtures Corrupt Deals? On the Role of Confidence and Transaction Costs”, in D. Della Porta & S. Rose-Ackerman eds., Corrupt Exchanges (Nomos Verlag; Baden Baden, Germany).

Lambsdorff, Johann Graf. 2002b. Confidence and Illegal Transactions. American Journal of Economics & Sociology

Lambsdorff, Johann Graf. 2002c. Corruption and Rent-Seeking. Public Choice.

Lambsdorff, Johann Graf. 2002d. How Confidence Facilitates Illegal Transactions: An Empirical Approach. American Journal of Economics & Sociology

Lambsdorff, Johann Graf. 2002e. Making Corrupt Deals: Contracting in the Shadow of the Law. Journal of Economic Behavior and Organization

Lambsdorff, Johann Graf. 2003a. How Corruption Affects Persistent Capital Flows. Economics of Governance

Lambsdorff, Johann Graf. 2003b. How Corruption Affects Productivity. Kyklos

Lambsdorff, Johann Graf. 2006a. “Causes and Consequences of Corruption--What Do We Know from a Cross-Section of Countries?” in Susan Rose-Ackerman, ed., International Handbook on the Economics of Corruption. Cheltenham, UK: Edward Elgar.

Lambsdorff, Johann Graf. 2006b. “Measuring Corruption – The Validity and Precision of Subjective Indicators (CPI)”, in Charles Sampford, Arthur Shacklock, Carmel Connors & Fredrik Galtung eds., *Measuring Corruption* (Aldershot: Ashgate)

Lambsdorff, Johann Graf. 2007. *The Institutional Economics of Corruption and Reform*. New York: Cambridge University Press.

Lambsdorff, Johann Graf. 2009. “The Organization of Anti-Corruption: Getting Incentives Right,” in Robert I. Rotberg ed., *Corruption, Global Security, and World Order* (Washington, D.C.: Brookings Institution)

Lambsdorff, Johann Graf. 2010. *Who Accepts Bribery? Evidence from a Global Household Survey*. Working Paper.

Lambsdorff, Johann Graf. 2011. *Economic Approaches to Anticorruption*. CESifo DICE Report

Lambsdorff, Johann Graf. 2013a. “Securing Investor Confidence or Fighting Corruption? How Intergovernmental Organizations May Reconcile Two Opposing Goals”, in Susan Rose-Ackerman & Paul D. Carrington eds., *Anti-Corruption Policy: Can International Actors Play a Constructive Role?* (Durham: Carolina Academic Press)

Lambsdorff, Johann Graf. 2013b. *Corrupt Intermediaries in International Business Transactions: Between Make, Buy and Reform*. *European Journal of Law & Economics*.

Lambsdorff, Johann Graf. 2015. “Behavioural and Institutional Economics as an Inspiration to Anti-Corruption: Some Counterintuitive Findings”, in Paul M. Heywood ed., *The Routledge Handbook of Political Corruption* (New York: Routledge)

Lamm, Carolyn, Hansel T. Pham & Rahim Moloo. 2010. “Fraud and Corruption in International Arbitration”, in Miguel Angel Fernandez-Ballesteros & David Arias eds., *Liber Amicorum Barnardo Cremades (La Ley)*

Lamoreaux, P.T., P.N. Michas & W.L. Schultz. 2015. *Do Accounting and Audit Quality Affect World Bank Lending?* *Accounting Review*

Lancaster, Thomas D. & Gabriella Montinola. 2001. *Comparative Political Corruption: Issues of Operationalization and Measurement*. *Studies in Comparative International Development* 36(3): 3-28.

Lancaster, Thomas D. & Gabriella R. Montinola. 1997. *Toward a Methodology for the Comparative Study of Political Corruption*. *Crime, Law & Social Change*

Landell-Mills, Pierre. 2013. *Citizens Against Corruption: Report From the Front Line*.

Langbein, Laura & Stephen Knack. 2008. *The Worldwide Governance Indicators and Tautology: Causally Related Separable Concepts, Indicators of a Common Cause, or Both?* *World Bank Policy Research Working Paper* 4669.

1 Langevoort, Donald C. 2002. Monitoring: The Behavioral Economics of Corporate  
Compliance with Law. Columbia Business Law Review

2 LaPalombara, Joseph. 1994. Structural and Institutional Aspects of Corruption. Social  
3 Research

4 Lapshyna, I. 2014. Corruption as a Driver of Migration Aspirations: The Case of Ukraine.  
5 Economics & Sociology

6 Larcinese, Valentino & Indraneel Sircar. 2014. Crime and Punishment the British Way:  
Accountability Channels Following the MPs' expenses Scandal. Working paper.

7 Large, D. 2005. "Introductory Survey: Corruption and Reconstruction after War", in  
8 Corruption and Post-Conflict Reconstruction: Breaking the Vicious Circle (Paris: OECD).

9 Larmour, P. 2007. A Short Introduction to Corruption and Anti-Corruption. CIES Working  
10 paper 3.

11 Larmour, P. 2008. Corruption and the Concept of "Culture": Evidence from the Pacific  
12 Islands. Crime, Law & Social Change

13 Larmour, P. 2009. "Corruption, Culture and Institutions: Evidence from the Pacific Islands",  
in Gong, T. & S.K. Ma eds., Preventing Corruption in Asia: Institutional Design and Policy  
14 Capacity (London: Routledge)

15 Larmour, Peter. 2012. Interpreting Corruption: Culture and Politics in the Pacific Islands  
16 (Honolulu: University of Hawaii Press).

17 Larrain, F. & J. Tavares. 2004. does Foreign Direct Investment Decrease Corruption? Latin  
American Journal of Economics

18 Larrain, Felipe & Jose Tavares. 2007. Can Openness Deter Corruption? The Role of Foreign  
19 Direct Investment. CEPR Discussion Papers 6488.

20 Larrain, Felipe & Jose Tavares. 2007. Can Openness Deter Corruption? The Role of Foreign  
21 Direct Investment. CEPR Discussion Papers 6488.

22 Larreguy, Horacio, John Marshall & James M. Snyder, Jr. 2014. Revealing Malfeasance:  
23 How Local Media Facilitates Electoral Sanctioning of Mayors in Mexico. Working paper.

24 Lascoumes, Pierre & Odette Tomescu-Hatto. 2008. French Ambiguities in Understandings  
of Corruption: Concurrent Definitions. Perspectives on European Politics & Society

25 Lascoumes, Pierre. 2014. "Condemning Corruption and Tolerating Conflicts of Interest:  
26 French 'Arrangements' Regarding Breaches of Integrity", in Jean-Bernard Auby, Emmanuel Breen  
& Thomas Perroud eds., Corruption and Conflicts of Interest: A Comparative Law Approach  
27

28 Latham, M. 2015. "The City Has Been Wronged and Abused!": Institutional Corruption in  
the Eighteenth Century. Economic History Review 68(3): 1038-1061.

- 1 Latimer, Paul & A.J. Brown. 2008. Whistleblower Laws: International Best Practice. UNSW  
2 Law Journal
- 3 Lavallee, Emmanuelle, Mireille Razafindrakoto & Francois Roubaud. 2008. Corruption and  
4 Trust in Political Institutions in Sub-Saharan Africa. Afrobarometer Working Paper No. 102.
- 5 Lawal, Gbenga. 2007. Corruption and Development in Africa: Challenges for Political and  
6 Economic Change. Humanity & Social Science Journal
- 7 Lawson, Letitia. 2009. The Politics of Anticorruption Reform in Africa. Journal of Modern  
8 African Studies
- 9 Lazar, Sian. 2005. "Citizens Despite the State: Everyday Corruption and Local Politics in El  
10 Alto, Bolivia", in Dieter Haller & Chris Shore eds., Corruption: Anthropological Perspectives  
11 (Pluto Press).
- 12 Lazarova, Emiliya & Ilaria Mosca. 2007. does Governance Matter for Aggregate Health  
13 Capital? Applied Economics Letters.
- 14 Le Billon, P. 2014. Natural Resources and Corruption in Post-War Transitions: Matters of  
15 Trust. Third World Quarterly
- 16 Le Billon, Philippe. 2003. Buying Peace or Fueling War: The Role of Corruption in Armed  
17 Conflicts. Journal of International Development
- 18 Le Billon, Philippe. 2008. Corrupting Peace? Peacebuilding and Post-Conflict Corruption.  
19 International Peacekeeping.
- 20 Le Billon, Philippe. 2013. "Resource Grabs", in Soreide, Tina & Aled Williams eds.,  
21 Corruption, Grabbing and Development .
- 22 Le Vine, Victor T. 1993. Administrative Corruption and Democratization in Africa: Aspects  
23 of the Theoretic Agenda. Corruption and Reform
- 24 Le, Quan V. 2006. Corruption and Capital Flight: An Empirical Assessment. International  
25 Economic Journal
- 26 Le, Van-Ha, Jakob de Haan & Erik Dietzenbacher. 2013. Do Higher Government Wages  
27 Reduce Corruption? Evidence Based on a Novel Dataset. CES ifo Working Paper No. 4254.
- 28 Lecuna, Antonio. 2012. Corruption and Size Decentralization. Journal of Applied  
Economics
- Ledeneva, A. 2009. Corruption in Post-Communist Societies: A Re-Examination.  
Perspectives on European Politics and Society
- Lederman, Daniel & William Maloney. 2008. In Search of the Missing Resource Curse.  
Economia

Lederman, Daniel, Norman Loayza & Rodrigo Soares. 2005. Accountability and Corruption: Political Institutions Matter. Economics & Politics

Ledyeva, S., P. Karhunen, R. Kosonen & J. Whalley. 2015. Offshore Foreign Direct Investment, Capital Round-Trapping, and Corruption: Empirical Analysis of Russian Regions. Economic Geography

Ledyeva, Svetlana, Paivi Karhunen & Riitta Kosonen. 2013. Birds of a Feather: Evidence on Commonality of Corruption and Democracy in the Origin and Location of Foreign Investment in Russian Regions. European Journal of Political Economy

Lee, Charles M.C. & David Ng. 2009. Corruption and International Valuation: does Virtue Pay? Journal of Investing

Lee, Cheol-Sung. 2007. Labor Unions and Good Governance: A Cross-National Comparative Analysis. American Sociological Review

Lee, Francis L.F. 2015. How Citizens React to Political Scandals Surrounding Government Leaders: A Survey Study in Hong Kong. Asian Journal of Political Science

Lee, H.H. Lim, D.D. Moore & J. Kim. 2013. How Police Organizational Structure Correlates with Frontline Officers' Attitudes Toward Corruption: A Multilevel Model. Police Practice & Research: An International Journal

Lee, J., K. Sigmund, U. Dieckmann & Y. Iwasa. 2015. Games of Corruption: How to Suppress Illegal Logging. Journal of Theoretical Biology

Lee, Judith A. & James D. Slear. 2007. Unique Problems with FCPA Compliance in the People's Republic of China. Business Law Today

Lee, L. 2014. Certainty in Coming Clean: Establishing an FCPA Safe Harbor for Self-Reporting Companies.

Lee, Paul L. 2010. A Renewed Focus on Foreign Corruption and Politically exposed Persons. Banking Law Journal

Lee, S. 2015. Quality of Government and Tourism Destination Competitiveness. Tourism Economics

Lee, Seung-Hyun & D. Weng. 2013. does Bribery in the Home Country Promote or Dampen Firm exports? Strategic Management Journal

Lee, Seung-Hyun & Kyeungrae Kenny Oh. 2007. Corruption in Asia: Pervasiveness and Arbitrariness. Asia Pacific Journal of Management

Lee, Seung-Hyun & Sungjin J. Hong. 2012. Corruption and Subsidiary Profitability: US MNC Subsidiaries in the Asia Pacific Region. Asia Pacific Management Journal



Pg 1678 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Lee, Seung-Hyun, Kyeungrae (Kenny) Oh & Lorraine Eden. 2010. Why Do Firms Bribe?  
2 Insights from Residual Control Theory. Management International Review
- 3 Lee, Young & Omar Azfar. 2007. Corruption and Trade Regulations: An Instrumental  
4 Variable Approach. Applied Economics Letters
- 5 Leemann, L. & D. Bochsler. 2014. A Systematic Approach to Study Electoral Fraud.  
6 Electoral Studies
- 7 Leenders, Reinoud. 2012. Spoils of Truce: Corruption and State-Building in Postwar  
8 Lebanon. Middle Eastern Studies (Cornell University Press).
- 9 Leeson, Peter T. & Russell S. Sobel. 2008. Weathering Corruption, Journal of Law and  
10 Economics.
- 11 Lehoucq, Fabrice. 2003. Electoral Fraud: Causes, Types, and Consequences. Annual Review  
12 of Political Science
- 13 Leibold, Annalisa. 2015. Extraterritorial Application of the FCPA Under International Law.  
14 Willamette Law Review
- 15 Leiken, Robert S. 1996. Controlling the Global Corruption Epidemic. Foreign Policy
- 16 Leita, Alexandra. 2010. Corruption and the Environmental Kuznets Curve: Empirical  
17 Evidence for Sulfur. Ecological Economics
- 18 Leite, Carlos & Jens Weidmann. 1999. does Mother Nature Corrupt? Natural Resources,  
19 Corruption, and Economic Growth. IMF Working Paper 99/85.
- 20 Lenz, Gabriel & Kevin Lim. 2009. Getting Rich(er) in Office? Corruption and Wealth  
21 Accumulation in Congress. Working paper.
- 22 Leontieva, L.S., T.V. Khalilova, L.F. Gaynullina & A.I. Khalilov. 2015. Social-  
23 Communciative Innovations in Anti-Corruption Activies. Asian Social Science
- 24 Leroy, Anne-Marie & Frank Fariello. 2012. The World Bank Group Sanctions Process and  
25 Its Recent Reforms (Washington, DC: World Bank).
- 26 Lessig, Lawrence. 2011. Republic Lost: How Money Corrupts Congress—and a Plan to  
27 Stop It.
- 28 Lessig, Lawrence. 2014. A Reply to Professors Cain and Charles. California Law Review
- Lessig, Lawrence. 2014. What an Originalist would Understand “Corruption” to Mean.  
California Law Review
- Lessmann, Christian & Gunther Markwardt. 2010. One Size Fits All? Decentralization,  
Corruption, and the Monitoring of Bureaucrats. World Development



1 Lestelle, Evan P. 2008. The Foreign Corrupt Practices Act, International Norms of Foreign  
2 Public Bribery, and Extraterritorial Jurisdiction. Tulane Law Review

3 Letyaev, V. & F. Letyaeva. 2015. Corruption Threats in Regulations: Analytical Review of  
4 the Literature and Case Materials of the Russian Federation. Journal of Sustainable Development

5 Letzkus, Sarah. 2008. Damned If You Do, Damned If You Don't: The Speech and Debate  
6 Clause and Investigating Corruption in Congress 40 Ariz. St. L.J. 1377

7 Leung, J. 2015. Xi's Corruption Crackdown: How Bribery and Graft Threaten the Chinese  
8 Dream. Foreign Affairs

9 Levchenko, Andrei A. 2013. International Trade and Institutional Change. Journal of Law,  
10 Economics & Organization

11 Leventhal, Robert. 2008. International Legal Standards on Corruption. American Society of  
12 International Law Proceedings

13 Levi, M. 2015. Money for Crime and Money From Crime: Financing Crime and Laundering  
14 Crime Proceeds. European Journal on Criminal Policy & Research

15 Levin, Ines, Gabe Cohn, R. Michael Alvarez & Peter C. Ordeshook. 2009. Detecting Voter  
16 Fraud in an Electronic Voting Context: An Analysis of the Unlimited Reelection Vote in Venezuela.  
17 Working paper.

18 Levin, Mark & Georgy Satarov. 2000. Corruption and Institutions in Russia. European  
19 Journal of Political Economy

20 Levin, Ronald M. 2001. Fighting the Appearance of Corruption. Washington University  
21 Journal of Law & Policy

22 Levmore, Saul. 1998. Efficiency and Conspiracy: Conflicts of Interest, Anti-Nepotism  
23 Rules, and Separation Strategies. Fordham Law Review

24 Levy, D. 2007. Price Adjustment under the Table: Evidence on Efficiency-Enhancing  
25 Corruption. European Journal of Political Economy

26 Lewis, Colin M. & Peter Lloyd-Sherlock. 2009. Social Policy and Economic Development  
27 in South America: An Historical Approach to Social Insurance. Economics & Society

28 Lewis, M. & P. Stenning. 2012. Considering the Glenister Judgment: Independence  
Requirements for Anti-Corruption Institutions. SA Crime Quarterly

Lewis, M. 2007. Informal Payments and the Financing of Health Care in Developing and  
Transition Countries. Health Affairs

Lewis, Margaret K. 2012. Presuming Innocence, or Corruption, in China. Columbia Journal  
of Transnational Law

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1 Lewis, Maureen. 2006. Governance and Corruption in Public Health Care Systems. Center  
for Global Development Working Paper No. 78.

2 Lewis-Faupel, Sean, Yusuf Neggers, Benjamin A. Olken & Rohini Pande. 2014. Can  
3 Electronic Procurement Improve Infrastructure Provision? Evidence from Public Works in India  
and Indonesia. Working paper.

4  
5 Li, H., M. Tang & N. Huhu. 2015. How does Democracy Influence Citizens' Perceptions of  
Government Corruption? A Cross-National Study. Democratization.

6 Li, Hongyi, Lixin Colin Xu & Heng-Fu. Zou. 2000. Corruption, Income Distribution, and  
7 Growth. Economics & Politics

8 Li, Ling. 2011. Performing Bribery in China: guanxi-practice, corruption with a human  
9 Face. Journal of Contemporary China

10 Li, Ling. 2011. The "Production" of Corruption in China's Courts – The Politics of Judicial  
Decision-Making and Its Consequences in a One-Party State. U.S. Asia Law Institute Working  
11 Paper.

12 Li, S., C. Buhren, B. Frank & H. Qin. 2015. Group Decision Making in a Corruption  
13 experiment: China and Germany Compared. Jahrbucher Fur Nationalokonomie Und Statistik

14 Li, Sha, Christoph Buhren, & Bjorn Frank. 2011. Group Decision Making in a Corruption  
experiment: China and Germany Compared. Working paper.

15  
16 Li, Wei. 2002. "Corruption during the Economic Transition in China", in Donatella Della  
Porta & Susan Rose-Ackerman eds., Corrupt Exchanges: Empirical Themes in the Politics and  
17 Political Economy of Corruption.

18 Li, Wei. 2002. Corruption and Resource Allocation: Evidence from China.

19 Li, Wei. 2002. Measuring Corruption under China's Dual-Track System.

20 Li, Y., F.K. Yao & D. Ahlstrom. 2015. The Social Dilemma of Bribery in Emerging  
21 Economies: A Dynamic Model of Emotion, Social Value, and Institutional Uncertainty. Asia  
Pacific Journal of Management

22 Licht, Amir, Chanan Goldschmidt & Shalom Schwartz. 2007. Culture Rules: The  
23 Foundations of the Rule of Law and Other Norms of Governance. Journal of Comparative  
24 Economics

25 Lien, Da Hsiang Donald. 1986. A Note on Competitive Bribery Games. Economic Letters

26 Lien, Da-Hsaing. 1990. Corruption and Allocation Efficiency. Journal of Development  
27 Economics.

28 Lierl, Malte. 2014. Selection or Incentives? experimental Evidence on the Accountability of  
Village Leaders in Tanzania. Working paper.

1 Liew, L.H. 1992. Corruption as a Form of Insurance. *European Journal of Political*  
2 *Economy*

3 Light, Matthew. 2014. Police Reforms in the Republic of Georgia: The Convergence of  
4 Domestic and Foreign Policy in an Anti-Corruption Drive. *Policing & Society*

5 Lim, Delphia, Maryum Jordan, Patrick Kibbe, David Donatti & Jose Vicente. 2013.

6 Access to Remedies for Transnational Public Bribery: A Governance Gap. *ABA Criminal*  
7 *Justice*

8 Lim, Linda Y.C. & Aaron Stern. 2002. State Power and Private Profit: The Political  
9 Economy of Corruption in Southeast Asia. *Asian-Pacific Economic Literature*

10 Lin, Jun & Steven X. Si. 2010. Can Guanxi Be a Problem? Contextes, Ties, and Some  
11 Unfavorable Consequences of Social Capital in China. *Asia Pacific Journal of Management*.

12 Lin, Min-Wei & Chilik Yu. 2014. Can Corruption Be Measured? Comparing Global Versus  
13 Local Perceptions of Corruption in East and Southeast Asia. *Journal of Comparative Policy*  
14 *Analysis*7.

15 Lindberg, J. & D. Herath. 2014. Land and Grievances in Post-Conflict Sri Lanka: exploring  
16 the Role of Corruption Complaints. *Third World Quarterly*

17 Lindberg, Jonas & Camilla Orjuela. 2014. Corruption in the Aftermath of War: An  
18 Introduction. *Third World Quarterly*

19 Lindberg, Staffan I. 2003. "It's Our Time to 'Chop'": Do Elections Feed Neo-  
20 Patrimonialism Rather than Counteract It? *Democratization*

21 Linde, Jonas & Gissur O. Erlingsson. 2013. The Eroding Effect of Corruption on System  
22 Support in Sweden. *Governance*

23 Linde, Jonas. 2012. Why Feed the Hand that Bites You? Perceptions of Procedural Fairness  
24 and System Support in Post-Communist Democracies. *European Journal of Political Research*

25 Linder, A. & C. Santiso. 2002. Assessing the Predictive Power of Country Risk Ratings and  
26 Governance Indicators. *SAIS Working Paper 02/02*.

27 Lindgren, J. 1993. The Theory, History and Practice of the Bribery-Extortion Distinction.  
28 *University of Pennsylvania Law Review* 141: 1695-1740.

Lindgren, James. 1988. The Elusive Distinction Between Bribery and Extortion: From the  
Common Law to the Hobbs Act. *UCLA Law Review* 35: 815-.

Lindkvist, Ida. 2013. "Using Salaries as a Deterrent to Informal Payments in the Health  
Sector", in Soreide, Tina & Aled Williams eds., *Corruption, Grabbing and Development* .

Lindkvist, Ida. 2013. Informal Payments and Health Worker Effort: A Quantitative Study

from Tanzania. Health Economics

Lindsey, Carolyn. 2009. More Than You Bargained For: Successor Liability under the U.S. Foreign Corrupt Practices Act. Ohio Northern University Law Review

Lindsey, R. & H. Dick. 2002. Corruption in Asia: Rethinking the Good Governance Paradigm (Annandale, NSW: Federation Press).

Lindskog, H., S. Brege & P.O. Brehmer. 2010. Corruption in Public Procurement and Private Sector Purchasing. Organizational Transformation & Social Change

Lindstedt, Catharina & Daniel Naurin. 2010. Transparency Is Not Enough: Making Transparency Effective in Reducing Corruption. International Political Science Review

Linhartova, V. & J. Volejnikova. 2015. Quantifying Corruption at a Subnational Level. E&M Ekonomie A Management

Lio, M.C., M.C. Liu & Y.P. Ou. 2011. Can the Internet Reduce Corruption? A Cross-Country Study Based on Dynamic Panel Data Models. Government Information Quarterly

Liou, Yu-Ming & Paul Musgrave. 2013. Refining the Oil Curse: Country-Level Evidence from Exogenous Variations in Resource Income. Comparative Political Studies

Lipinski, Arie J. 2011. Combating Government Corruption: Suing the Federal Government via a Proposed Amendment to the Civil RICO Statute. Valparaiso University Law Review

Lipper, Gregory M. 2010. Foreign Corrupt Practices Act and the Elusive Question of Intent. American Criminal Law Review

Lippitt, Anne H. 2013. An Empirical Analysis of the Foreign Corrupt Practices Act. Virginia Law Review

Lipset, Seymour Martin, Kyoung-Ryung Seong & John Charles Torres. 1993. A Comparative Analysis of the Social Requisites of Democracy. International Social Science Journal

Lipset, Seymour Martin. & Gabriel Salman Lenz. 2000. "Corruption, Culture and Markets" in Lawrence J. Harrison & Samuel P. Huntington eds. Culture Matters: How Values Change Human Progress, pp. 112-124. New York: Basic Books.

Litschig, Stephan & Yves Zamboni. 2014. Judicial Presence and Rent Extraction. Working paper.

Litwin, Daniel. 2013. On the Divide Between Investor-State Arbitration and the Global Fight Against Corruption. Transnational Dispute Management

Liu, Alan P.L. 1983. The Politics of Corruption in the People's Republic of China. American Political Science Review

Liu, Cheol & John L. Mikesell. 2014. The Impact of Public Officials' Corruption on the Size

and Allocation of U.S. State Spending. Public Administration Review

Liu, L. 2015. The Global Anti-Bribery Collaboration in Evolution. Journal of Financial Crime

Liu, Q. & Y. Peng. 2015. Determinants of Willingness to Bribe: Micro Evidence from the Educational Sector in China. Jahrbucher Fur Nationalokonomie Und Statistik

Liu, Qijun & Yaping Peng. 2015. Corruption in College Admissions Examinations in China. International Journal of Educational Development

Liu, X., G.I. Christopoulos & Y. Hong. 2014. The Role of Decision Frame on Decision-Making Regarding Bribe Giving. Academy of Management Proceedings.

Liu, Yongzheng & Haibo Feng. 2015. Tax Structure and Corruption: Cross-Country Evidence. Public Choice.

Ljunge, M. 2015. Social Capital and the Family: Evidence that Strong Family Ties Cultivate Civic Virtues. Economica

Llamzon, Aloysius P. 2013. State Responsibility for Corruption: The Attribution Asymmetry in International Investment Arbitration. Transnational Dispute Management

Llamzon, Aloysius. 2009. The Control of Corruption through International Investment Arbitration: Potential and Limitations. American Society of International Law Proceedings

Lloyd-Ellis, Huw & Nicholas Marceau. 2003. Endogenous Insecurity and Economic Development. Journal of Development Economics

Lobnikar, B. & G. Mesko. 2015. Perception of Police Corruption and the Level of Integrity Among Slovenian Police Officers. Police Practice & Research

Loe, T.W., L. Ferrell & P. Mansfield. 2000. A Review of Empirical Studies Assessing Ethical Decision Making in Business. Journal of Business Ethics

Loftis, M.W. 2015. Deliberate Indiscretion? How Political Corruption Encourages Discretionary Policy Making. Comparative Political Studies

Lomnitz, C. 1995. Ritual, Rumor and Corruption in the Constitution of Polity in Mexico. Journal of Latin American Anthropology

Lomnitz, Larissa. 1988. Informal Exchange Networks in Formal Systems: A Theoretical Model. American Anthropologist

Long, D. Michael & Spuma Rao. 1995. The Wealth Effects of Unethical Business Behavior. Journal of Economics & Finance

Long. 2013. A Study of Drug-Related Police Corruption Arrests. Policing: An International Journal of Police Strategies & Management

1 Lopatta, K., R. Jaeschke & C. Yi. 2014. The Strategic Use of Language in Corrupt Firms’  
2 Financial Reporting. Working paper.

3 Lopez, J. & J. Santos. 2014. does Corruption Have Social Roots? The Role of Culture and  
4 Social Capital. Journal of Business Ethics

5 Lopez, L. 2015. Corruption and International Aid Allocation: A Complex Dance. Journal of  
6 Economic Development

7 Lopez, R. & S. Mitra. 2000. Corruption, Pollution and the Kuznets Environment Curve.  
8 Journal of Environmental Economics & Management.  
9 J

10 Lord, Nicholas James. 2014. Detecting and Investigating Transnational Corporate Bribery in  
11 Centralised and Decentralised Enforcement Systems: Discretion and (De-)Prioritisation in the UK  
12 and Germany. Policing & Society .

13 Lord, Nicholas James. 2014. Responding to Transnational Corporate Bribery Using  
14 International Frameworks for Enforcement: Anti-Bribery and Corruption in the UK and Germany.  
15 Criminology & Criminal Justice

16 Losco, Michael A. 2014. Streamlining the Corruption Defense: A Proposed Framework for  
17 FCPA-ICSID Interaction. Duke Law Journal.

18 Lovei, L. & A. McKechnie. 2000. The Costs of Corruption for the Poor – The Energy  
19 Sector. World Bank, Public Policy for the Private Sector Note 207.

20 Lovell, David W. 2005. “Corruption as a Transitional Phenomenon: Understanding Endemic  
21 Corruption in Postcommunist States”, in Dieter Haller & Chris Shore eds., Corruption:  
22 Anthropological Perspectives (Pluto Press).

23 Low, Lucinda & John Davis. 1998. Coping with the Foreign Corrupt Practices Act: A  
24 Primer for Energy and Natural Resource Sector. Journal of Energy & Natural Resources Law

25 Low, Lucinda A. 1998. Transnational Corruption: New Rules for Old Temptations, New  
26 Players to Combat a Perennial Evil. Am. Soc. Int’l L. Proceedings

27 Low, Lucinda A. et al. 1998. The Inter-American Convention Against Corruption: A  
28 Comparison with the United States Foreign Corrupt Practices Act. Virginia Journal of International  
Law

Low, Lucinda A., Thomas K. Sprange & Milos Barutciski. 2010. Global Anti-Corruption  
Standard and Enforcement: Implications for Energy Companies. Journal of World Energy Law &  
Business

Lowen, Aaron & Andrew Samuel. 2012. Bribery and Endogenous Monitoring Effort: An  
experimental Study. Eastern Economic Journal

Lowenheim, Oded. 2008. Examining the State: A Foucauldian Perspective on International

“Governance Indicators”. Third World Quarterly

Lowenstein, Daniel. 1985. Political Bribery and the Intermediate Theory of Politics. UCLA Law Review

Lu, Tiffany. 2013. The “Obtaining or Retaining Business” Requirement: Breathing New Life into the Business Nexus Provision of the FCPA. Fordham Journal of Corporate & Financial Crime

Lu, Xiaobo. 2000. Booty Socialism, Bureau-preneurs, and the State in Transition: Organizational Corruption in China, Comparative Politics

Lubin, N. 2003. Who’s Watching the Watchdog? Journal of International Affairs

Ludwin-Peery, Ethan & Dustin Tingley. 2014. Ethical Situations and Their Effects on Judgments of Punishment. Ethics & Behavior

Lui, Francis T. 1985. An Equilibrium Queuing Model of Bribery. Journal of Political Economy

Lui, Francis T. 1986. A Dynamic Model of Corruption Deterrence. Journal of Public Economics

Lui, Francis T. 1996. Three Aspects of Corruption. Contemporary Economic Policy

Luiz, J. & C. Stewart. 2014. Corruption, South African Multinational Enterprises and Institutions in Africa. Journal of Business Ethics

Lukito, A.S. 2015. Fostering and Enhancing the Role of the Private Sector: A Prevention Way Towards Corruption Eradication in Indonesia. Journal of Financial Crim

Luo, Yadong, Stephanie L. Wang & Ying Huang. 2012. Guanxi and Organizational Performance: A Meta-Analysis. Management & Organization Review

Luo, Yadong. 2002. Corruption and Organization in Asian Management Systems. Asia Pacific Journal of Managemen

Luo, Yadong. 2004. An Organizational Perspective of Corruption. Management & Organization Review.

Luo, Yadong. 2006. Political Behavior, Social Responsibility, and Perceived Corruption: A Structural Perspective. Journal of International Business Studies

Luo, Yadong. 2008. The Changing Chinese Culture and Business Behavior: The Perspective of Intertwinement between Guanxi and Corruption. International Business Review

Luo, Yadong. 2011. Strategic Responses to Perceived Corruption in an Emerging Market: Lessons from MNEs Investing in China. Business & Society



Pg 1686 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 Luong, Pauline Jones & Erika Weinthal. 2010. Oil Is Not a Curse: Ownership Structure and  
2 Institutions in Soviet Successor States (New York: Cambridge University Press).

3 Ma, Stephen K. 2009. “‘Policing the Police’: A Perennial Challenge for China’s  
4 Anticorruption Agencies”, in Gong, T. & S.K. Ma eds., Preventing Corruption in Asia: Institutional  
5 Design and Policy Capacity (London: Routledge)

6 Maass, Arthur. 1987. U.S. Prosecution of State and Local Officials for Political Corruption:  
7 Is the Bureaucracy Out of Control in a High Stakes Operation Involving the Constitutional System?  
8 Publius: The Journal of Federalism

9 Mackenzie, G. Calvin with Michael Hafken. 2002. Scandal Proof: Do Ethics Laws Make  
10 Government Ethical? Washington, D.C., Brookings Institution.

11 Maclean, T., B.E. Litzky & D.K. Holderness. 2015. When Organizations Don’t Walk Their  
12 Talk: A Cross-Level Examination of How Decoupling Formal Ethics Programs Affects  
13 Organizational Members. Journal of Business Ethics 128

14 MacMillan, Joanna. 2011. Reformasi and Public Corruption: Why Indonesia’s Anti-  
15 Corruption Agency Strategy Should Be Reformed to Effectively Combat Public Corruption. Emory  
16 International Law Review

17 Macrae, John. 1982. Underdevelopment and the Economics of Corruption: A Game Theory  
18 Approach. World Development

19 Maestad, O. & A. Mwisongo. 2007. Informal Payments and the Quality of Health Care in  
20 Tanzania: Results from Qualitative Research. CMI Working Paper 2007:5 (Bergen: Chr. Michelsen  
21 Institute).

22 Maestad, O. & A. Mwisongo. 2011. Informal Payments and the Quality of Health Care:  
23 Mechanisms Revealed by Tanzanian Health Workers. Health Policy

24 Magaloni, Beatriz, Aila M. Matanock, Vidal Romero & Alberto Diaz-Cayeros. 2014. Living  
25 in Fear: The Dynamics of Extortion in Mexico’s Criminal Insurgency.

26 Magrath, Willam B. 2012. “Corruption and Crime in Forestry”, in Adam Graycar & Russell  
27 G. Smith eds., Handbook of Global Research and Practice in Corruption ,

28 Mahagaonkar, P. 2008. Corruption and Innovation: A Grease or Sand Relationship? Jena  
Economic Research Papers, No. 2008,017.

Mahdavi, Paasha. 2014. Extortion in the Oil States: Nationalization, Regulatory Structure,  
and Corruption. Working paper.

Mahmood, R. 2004. Can Information and Communication Technology Help Reduce  
Corruption? How So and Why Not: Two Case Studies from South Asia. Perspectives on Global  
Development & Technology

Mahmood, Shakeel Ahmed Ibne. 2010. Public Procurement and Corruption in Bangladesh:



- 1 Confronting the Challenges and Opportunities. Journal of Public Administration & Policy Research
- 2 Majeed, M.T. 2014. Corruption and Trade. Journal of Economic Integration
- 3 Majtan, Roman. 2013. The Self-Cleaning Dilemma: Reconciling Competing Objectives of
- 4 Procurement Processes. George Washington International Law Review
- 5 Majumdar, Mukul & Seung Han Yoo. 2012. Strategic Analysis of Influence Peddling.
- 6 International Journal of Game Theory
- 7 Makinwa, Abiola O. 2007. The Rules Regulating Transnational Bribery: Achieving a
- 8 Common Standard? International Business Law Journal
- 9 Makinwa, Abiola O. 2009. "International Corruption and the Privatisation of Security:
- 10 Resorting to Private Remedies", in M. Hildebrandt, A. Makinwa & A. Oehmichen eds., Controlling
- 11 Security in a Culture of Fear (Boom Juridische Uitgevers)
- 12 Makinwa, Abiola O. 2009. "The Role of International Arbitration in the Fight against
- 13 Corruption", in Olaf Meyer ed., Civil Law Consequences of Corruption (Baden-Baden: Nomos)
- 14 Makinwa, Abiola O. 2009. Researching Civil Remedies for International Corruption: The
- 15 Choice of the Comparative Method. Erasmus Law Review
- 16 Makinwa, Abiola O. 2010. "A Transaction Approach to Fighting Corruption", in J. Blad, M.
- 17 Hildebrandt, K. Rozenmond, M. Schuilenburg & P. Van Calster eds., Governing Security under the
- 18 Rule of Law? (Eleven International Publishing)
- 19 Makinwa, Abiola O. 2010. Motivating Civil Remedies for International Corruption: Nigeria
- 20 as an Illustrative Case Study. CALS Review of Nigerian Law & Practice
- 21 Makinwa, Abiola O. 2013. "Defining a Private Law Approach to Fighting Corruption", in
- 22 Susan Rose-Ackerman & Paul D. Carrington eds., Anti-Corruption Policy: Can International Actors
- 23 Play a Constructive Role? (Durham: Carolina Academic Press)
- 24 Makinwa, Abiola O. 2013. Good Governance: Negotiated Settlements for FCPA Violations
- 25 as a Model. Applied Research Today.
- 26 Makinwa, Abiola O. 2013. Private Remedies for Corruption: Towards an International
- 27 Framework (Eleven International Publishing).
- 28 Makuta, I. & B. O'Hare. 2015. Quality of Governance, Public Spending on Health and
- Health Status in Sub-Saharan Africa: A Panel Data Regression Analysis. BMC Public Health
- Malec, Kathryn L. & John A. Gardiner. 1987. Measurement Issues in the Study of Official
- Corruption: A Chicago Example. Corruption & Reform
- Malena, Carmen, Reiner Forster & Janmejay Singh. 2004. Social Accountability: An
- Introduction to the Concept and Emerging Practice. World Bank Social Development Paper No. 76.

1 Malesky, Edmund J. & Krislert Samphantharak. 2008. Predictable Corruption and Firm  
2 Investment: Evidence from a Natural experiment and Survey of Cambodian Entrepreneurs.  
Quarterly Journal of Political Science

3 Malesky, Edmund J., Cuong Viet Nguyen & Anh Tran. 2014. The Impact of  
4 Recentralization on Public Services: A Difference-in-Differences Analysis of the Abolition of  
Elected Councils in Vietnam. American Political Science Review

5 Malesky, Edmund J., Dimitar D. Gueorgulev & Nathan M. Jensen. 2014. Monopoly Money:  
6 Foreign Investment and Bribery in Vietnam, a Survey experiment. American Journal of Political  
Science

7 Malesky, Edmund, Paul Schuler & Anh Tran. 2012. The Adverse Effects of Sunshine:  
8 Evidence from a Field experiment on Legislative Transparency in an Authoritarian Assembly.  
9 American Political Science Review .

10 Malik, A.S. 1990. Avoidance, Screening and Optimal Enforcement. Rand Journal of  
11 Economics

12 Maljevic, A.D. Datzler, E. Muratbegovic & M. Budimlic. 2008. Professional Police in  
13 Bosnia and Herzegovina: Case Study – Police Corruption. European Journal of Crime, Criminal  
Law & Criminal Justice

14 Mandal, Biswajit & Sugata Markit. 2010. Corruption and Wage Inequality. International  
15 Review of Economics & Finance

16 Mandal, Biswajit. 2014. Traded Goods, Tax and Intermediation – the Role of Corrupt  
Nontraded Sector. Working paper.

17 Manea, T. 2015. Medical Bribery and the Ethics of Trust: The Romanian Case. Journal of  
18 Medicine & Philosophy

19 Manion, Melanie. 1996. Corruption by Design: Bribery in Chinese Enterprise Licensing.  
20 Journal of Law, Economics & Organization

21 Manion, Melanie. 1998. Correction to “Corruption by Design”. Journal of Law, Economics  
& Organization.

22 Manion, Melanie. 2004. Corruption by Design: Building Clean Government in Mainland  
23 China and Hong Kong. Cambridge: Harvard University Press, 2004.

24 Manion, Melanie. 2014. What Is Corrupt? A Model of Unacceptable International Business  
25 Practices in China. Working paper.

26 Manion, Melanie. 2015. “Institutional Design and Anti-Corruption in Mainland China” , in  
27 Paul M. Heywood ed., The Routledge Handbook of Political Corruption (New York: Routledge).

28 Manning, P.K. 2009. Bad Cops. Criminology & Public Policy

- 1 Manning, T.J. 2015. Private Equity and the FCPA: Deal-Making as Reform  
Mechanism. *Pepperdine Law Review*
- 2
- 3 Mansour, Sarah, Vjollca Sadiraj & Sally Wallace. 2014. Political Institutions and  
Corruption: An experimental Examination of the Right to Recall. Working paper.
- 4
- 5 Manzetti, Luigi & Carole J. Wilson. 2006. Corruption, Economic Satisfaction, and  
Confidence in Government: Evidence from Argentina. *The Latin Americanist*
- 6
- 7 Manzetti, Luigi & Carole J. Wilson. 2007. Why Do Corrupt Governments Maintain Public  
Support? *Comparative Political Studies*
- 8
- 9 Manzetti, Luigi & Charles H. Blake. 1996. Market Reforms and Corruption in Latin  
America: New Means for Old Ways. *Review of International Political Economy*
- 10
- 11 Mao, Yina, Chi-Sum Wong & Kelly Z. Peng. 2013. Breaking Institutionalized Corruption:  
Is the experience of the Hong Kong Independent Commission Against Corruption Generalizable?  
*Asia Pacific Journal of Management*
- 12
- 13 Maor, Moshe. 2004. Feeling the Heat? Anticorruption Mechanisms in Comparative  
Perspective. *Governance*
- 14
- 15 Marat, E. 2015. Global Money Laundering and Its Domestic Political Consequences in  
Kyrgyzstan. *Central Asian Survey*
- 16
- 17 Marberg, Sarah. 2012. Promises of Leniency: Whether Companies Should Self-Disclose  
Violations of the Foreign Corrupt Practices Act. *Vanderbilt Journal of Transnational Law*
- 18
- 19 Marceau, Justin F. 2007. A Little Less Conversation, A Little More Action: Evaluating and  
Forecasting the Trend of More Frequent and Severe Prosecutions Under the Foreign Corrupt  
Practices Act. *Fordham Journal of Corporate & Financial Law*
- 20
- 21 Marcelo, Simeon V. 2004. "Combating Corruption in the Philippines", in *Controlling  
Corruption in Asia and the Pacific*. (Manila: Asian Development Bank)
- 22
- 23 Marcouiller, Douglas & Leslie Young. 1995. The Black Hole of Graft: The Predatory State  
and the Informal Economy. *American Economic Review*
- 24
- 25 Marengo, F.D. 1988. The Link Between Political Corruption and Political Scandal.  
*Corruption & Reform* 3
- 26
- 27 Mariani, Paola. 2012. How Damages Recovery Actions Can Improve the Fight Against  
Corruption: The Crisis of Criminal Law Policies and the Role of Private Enforcement in an Italian  
Case of Judicial Corruption. *Bocconi University Legal Studies Research Paper No. 2007241*.
- 28
- Marique, Yseult. 2014. "Integrity in English and French Public Contracts: Changing  
Administrative Cultures?", in Jean-Bernard Auby, Emmanuel Breen & Thomas Perroud eds.,  
*Corruption and Conflicts of Interest: A Comparative Law Approach*

1 Marjit, S. V. Mukherjee & A. Mukherjee. 2000. Harassment, Corruption and Tax Policy.  
European Journal of Political Economy

2 Marjit, S. V. Mukherjee & A. Mukherjee. 2003. Harassment, Corruption and Tax Policy:  
3 Reply. European Journal of Political Economy .

4 Marjit, Sugata & Heling Shi. 1998. On Controlling Crime with Corrupt Officials. Journal of  
5 Economic Behavior & Organization 34: 163-72.

6 Marjit, Sugata, Biswajit Mandal & Suryadipta Roy. 2014. Trade Openness, Corruption and  
7 Factor Abundance: Evidence from a Dynamic Panel. Review of Development Economics

8 Mark, Gideon. 2012. Private FCPA Enforcement. American Business Law Journal

9 Marong, Alhaji B.M. 2002. Toward a Normative Consensus Against Corruption: Legal  
10 Effects of the Principles to Combat Corruption in Africa. Denver Journal of International Law &  
Policy

11 Marquette, H. & C. Peiffer. 2014. Corruption and Collective Action: Shifting the  
12 Equilibrium?. Birmingham Developmental Leadership Program Research Paper 32.

13 Marquette, Heather & Alan Doig. 2004. Drilling Down to the Detail: A Case Study into  
14 Anti-Corruption Project Records and Record-Keeping. Crime, Law & Social Change

15 Marquette, Heather, V. Pavarala & K. Malik. 2014. Religion and Attitudes Towards  
Corruption in India: A Collective Action Problem? Development in Practice

16 Marquette, Heather. 2001. Corruption, Democracy and the World Bank. Crime, Law &  
17 Social Change .

18 Marquette, Heather. 2004. The Creeping Politicization of the World Bank: The Case of  
19 Corruption. Political Studies

20 Marquette, Heather. 2007. Civic Education for Combating Corruption: Lessons from Hong  
Kong and the United States for Donor-Funded Programmes in Poor Countries. Public  
21 Administration & Development

22 Marquette, Heather. 2011. Donors, State-Building and Corruption: Lessons from  
23 Afghanistan and the Implications for Aid Policy. Third World Quarterly

24 Marquette, Heather. 2012. "Finding God" or "Moral Disengagement" in the Fight Against  
Corruption in Developing Countries? Evidence from India and Nigeria. Public Administration &  
25 Development

26 Marquette, Heather. 2013. "Corruption, Religion and Moral Development in Developing  
Countries", in Matthew Clarke ed., Handbook of Research on Development and Religion (Edward  
27 Elgar Publishing).

28 Marquette, Heather. 2015. "Religion, Ethics and Corruption: Field Evidence from India and

1 Nigeria” , in Paul M. Heywood ed., The Routledge Handbook of Political Corruption (New York: Routledge)

2 Marshall, Andrew. 2013. What’s Yours Is Mine: New Actors and New Approaches to Asset  
3 Recovery in Global Corruption Cases. Center for Global Development Policy Paper 018.

4 Marti, C. & Y. Kasperskaya. 2015. Public Financial Management Systems and Countries’  
5 Governance: A Cross-Country Study. Public Administration & Development

6 Martimort, David & Stephane Straub. 2009. Infrastructure Privatization and Changes in  
7 Corruption Patterns: The Roots of Public Discontent. Journal of Development Economics

8 Martin, A. Timothy. 1998. Corruption and Improper Payments: Global Trends and  
Applicable Laws. Alberta Law Review .

9 Martin, A. Timothy. 1999. The Development of International Bribery Law. Nat. Resources  
10 & Environment

11 Martin, A. Timothy. 2003. International Arbitration and Corruption: An Evolving Standard.  
12 International Energy & Mineral Arbitration

13 Martin, Susan Lorde. 1989. A Decade of Branti Decisions: A Government Official’s Guide  
14 to Patronage Dismissals. American University Law Review 39:

15 Martins, Pedro S. 2010. Cronyism. IZA Discussion Paper 5349.

16 Mashaba, M. 2005. Organised Crime and Corruption – Fighting the Problem within the  
NEPAD Framework. African Security Review

17 Mashali, B. 2012. Analyzing the Relationship Between Perceived Grand Corruption and  
18 Petty Corruption in Developed Countries: Case Study of Iran. International Review of  
Administrative Sciences

19 Masron, Tajul Ariffin & Eliza Nor. 2013. FDI in ASEAN-8: does Institutional Quality  
20 Matter? Applied Economics Letters

21 Matei, Ani & Lucica Matei. 2009. Public Integrity and Performance of Governance: A  
22 Comparative Study for South-Eastern Europe. Theoretical & Applied Economics

23 Matei, Ani & Lucica Matei. 2011. Assessing the Anti-corruption Strategies: Theoretical and  
24 Empirical Models. Journal of Management and Strategy

25 Matei, Ani, Lucica Matei & Carmen Savulescu. 2010. Public Integrity, Economic Freedom  
26 and Governance Performance: A Comparative Study for the EU Member States and Acceding  
Countries. Theoretical & Applied Economics

27 Matei, Lucica & Ani Matei. 2009. “Globalisation of Corruption” and Development of the  
28 Binom “Corruption – Public Integrity” in the Context of Romania Integration into the European  
Union. Theoretical & Applied Economics

1 Mather, A. & K. Singh. 2013. Foreign Direct Investment, Corruption and Democracy.  
2 Applied Economics.

3 Mathy, Pamela. 2011. Honest Services Fraud After Skilling. St. Mary's Law Journal

4 Mattarella, Bernardo Giorgio. 2014. "The Conflicts of Interests of Public Officers: Rules,  
5 Checks and Penalties", in Jean-Bernard Auby, Emmanuel Breen & Thomas Perroud eds.,  
6 Corruption and Conflicts of Interest: A Comparative Law Approach

7 Matti, J. 2014. Corruption, Income Inequality, and Subsequent Economic Growth.  
8 Undergraduate Economic Review.

9 Matukhno, N. 2015. Corruption, Contention, and Reform: The Power of Deep  
10 Democratization. Journal of Politics

11 Mauro, Paolo. 1995. Corruption and Growth. Quarterly Journal of Economics

12 Mauro, Paolo. 1997. Why worry about corruption? Economic Issues 6.

13 Mauro, Paolo. 1998. Corruption and the Composition of Government expenditure. Journal  
14 of Public Economics

15 Mauro, Paulo. 1998. Corruption: Causes, Consequences, and Agenda for Further Research.  
16 Finance & Developmen

17 Mauro, Paulo. 2004. Persistence of Corruption and Slow Economic Growth. IMF Staff  
18 Papers

19 Maxwell, Amanda E. & Richard F. Winters. 2004. A Quarter Century of (Data on)  
20 Corruption in the American States. Working paper.

21 Maxwell, Amanda E. & Richard F. Winters. 2005. Political Corruption in America.  
22 Working paper.

23 Maxwell, Daniel, Peter Walker, Cheyanne Church, Paul Harvey, Kevin Savage, Sarah  
24 Bailey, Roslyn Hees & Marie-Luise Ahlendorf. 2008. Preventing Corruption in Humanitarian  
25 Assistance: Final Research Report.

26 Mayfield, Loomis. 1993. Voting Fraud in Early Twentieth-Century Pittsburgh. Journal of  
27 Interdisciplinary History

28 Mazar, Nina & Dan Ariely. 2006. Dishonesty in Everyday Life and Its Policy Implications.  
Journal of Public Policy & Marketing

Mazar, Nina, On Amir & Dan Ariely. 2008. The Dishonesty of Honest People: A Theory of  
Self-Concept Maintenance. Journal of Marketing Research

Mazzacuva, F. 2014. Justifications and Purposes of Negotiated Justice for Corporate

1 Offenders: Deferred and Non-Prosecution Agreements in the UK and US Systems of Criminal  
2 Justice. Journal of Criminal Law

3 Mbaku, J.M. 1991. Military expenditures and Bureaurcratic Competition for Rents. Public  
4 Choice.

5 Mbaku, John M. 2000. Bureaucratic and Political Corruption in Africa: The Public Choice  
6 Perspective (Krieger: Malabar).

7 Mbaku, John Mukum. 1996. Bureaucratic Corruption in Africa: The Futility of Cleanups.  
8 Cato Journal

9 Mbaku, John Mukum. 1999. Corruption Cleanups in Developing Societies: The Public  
10 Choice Perspective. International Journal of Public Administration

11 McAdam, P. & O. Rummel. 2004. Corruption: A Non-Parametric Analysis. Journal of  
12 Economic Studies

13 McAllister, I. & S. White. 2015. Electoral Integrity and Support for Democracy in Belarus,  
14 Russia, and Ukraine. Journal of Elections, Public Opinion & Parties

15 McAllister, I. 2000. Keeping Them Honest: Public and Elite Perceptions of Ethical Conduct  
16 Among Australian Legislators. Political Studies

17 Mcallister, Ian. 2014. Corruption and Confidence in Australian Political  
18 Institutions. Australian Journal of Political Science

19 McCann, James A. & David Redlawsk. 2006. As Voters Go to the Polls, Will They Perceive  
20 a “Culture of Corruption”? PS: Political Science & Politics

21 McCann, James A. & Jorge I. Dominguez. 1998. Mexicans React to Electoral Fraud and  
22 Political Corruption: An Assessment of Public Opinion and Voting Behavior. Electoral Studies

23 McCann, James A. 2007. Corruption in the Eyes of American Citizens: Can It Ever Be  
24 Justified? does It Always Elicit Anger? Working paper.

25 McCarthy, B.J. 1984. Keeping an Eye on the Keeper – Prison Corruption and Its Control.  
26 Prison Journal

27 McChesney, Fred S. 1987. Rent Extraction and Rent Creation in the Economic Theory of  
28 Regulation. Journal of Legal Studies

McChesney, Fred S. 2001. Ever the Twain Shall Meet. Michigan Law Review.

McCoy, Jennifer & Heather Heckel. 2001. The Emergence of a Global Anti-Corruption  
Norm. International Politics

McCurley, C.M. & J.J. Mondak. 1995. Inspected by #1184063113: The Influence of  
Incumbents’ Competence and Integrity in U.S. House Elections. American Jouranl of Political



1 Science

2 McCusker, Rob. 2006. Review of Anticorruption Strategies. Australian Institute of  
3 Criminology Technical Background Paper 23.

4 McFarlane, John. 2000. Corruption and the Financial Sector: The Strategic Impact.  
5 Dickinson Journal of International Law

6 McGee, Robert W. & Serkan Benk. 2014. The Ethics of Accepting a Bribe: An Empricial  
7 Case Study of Turkey. Business & Law

8 McGirr, Shaun. 2013. Deliberate Indiscretion: Why Bureaucratic Agencies are Differently  
9 Corrupt. Working paper.

10 McLaren, John. 2003. Corruption and the Organization of Tax Administration: Non-  
11 Smithian Benefits from Specialization, in Institutional Elements of Tax Design and Reform  
12 (Washington, D.C.: World Bank).

13 Mclean, Nicholas M. 2012. Cross-National Patterns in FCPA Enforcement. Yale Law  
14 Journal

15 McLeod, Ross H. 2005. The Struggle to Regain Effective Government Under Democracy in  
16 Indonesia. Bulletin of Indonesian Economic Studies

17 McManus, C., W.L. Miller, R. Markowski & J. Wasilewski. 2004. Why Is Corruption in  
18 Poland “A Serious Cause for Concern”? Crime, Law & Social Change

19 McMillan, J. 1991. Dango: Japan’s Price-Fixing Conspiracies. Economics & Politics

20 McMillan, John & Pablo Zoido. 2004. How To Subvert Democracy: Montesinos in Peru.  
21 Journal of Economic Perspectives

22 McPake, B., D. Asimwe, F. Mwesigye, M. Ofumbi., L. Ortenblad, P. Streefland & A.

23 Turinde. 1999. Informal Economic Activities of Public Health Workers in Uganda:  
24 Implications for Quality and Accessibility of Care. Social Science & Medicine .

25 McWilliams, J. Nolan. 2007. Tug of War: The World Bank’s New Governance and  
26 Anticorruption Efforts. Kansas Journal of Law & Public Policy

27 Meagher, Patrick. 2005. Anti-Corruption Agencies: Rhetoric versus Reality. Journal of  
28 Policy Reform

Meagher, Patrick. 2002. Anti-Corruption Agencies: A Review of experience (Washington,  
D.C.: World Bank).

Mebane, Walter R., Jr. 2008. “Electoral Forensics: The Second-Digit Benford’s Law Test  
and Recent American Presidential Elections”, in R. Michal Alvarez, Thad E. Hall & Susan D. Hyde  
eds., Election Fraud: Detecting and Deterring Electoral Manipulation. (Washington, D.C.: The



Brookings Institution)

Mebane, Walter R., Jr. 2011. Comment on “Benford’s Law and the Detection of Election Fraud”. Political Analysis.

Medard, F.H. 1996. Public Corruption in Africa: A Comparative Perspective. Corruption & Reform.

Medard, Jean-Francois. 2002. “Corruption in the Neo-Patrimonial States of Sub-Saharan Africa”, in Arnold J. Heidenheimer & Michael Johnston eds., Political Corruption— Concepts and Contexts (London: Transaction Publishers).

Medina, Luis Fernando & Susan Stokes. 2007. Monopoly and Monitoring: An Approach to Political Clientalism, in H. Kitschelt & S. Wilkinson eds., Patrons, Clients, and Policies: Patterns of Democratic Accountability and Political Competition (Cambridge: Cambridge University Press).

Meessen, Karl M. 1995. Fighting Corruption Across the Border. Fordham Int’l L. J.

Mehlum, Halvor, Karl O. Moene & Ragnar Torvik. 2006. Cursed by Resources or Institutions? World Economy

Mehlum, Halvor, Karl O. Moene & Ragnar Torvik. 2006. Institutions and the Resource Curse. Economic Journal

Mehta, M.C. 2006. The Accountability Principle: Legal Solutions to Break Corruption’s Impact on India’s Environment. Journal of Environmental Law & Litigation

Meier, Kenneth J. & Thomas M. Holbrook. 1992. “I Seen My Opportunities and I Took ’Em”: Political Corruption in the United States. Journal of Politics

Mejia Acosta, Andres. 2013. The Impact and Effectiveness of Accountability and Transparency Initiatives: The Governance of Natural Resources. Development Policy Review

Melgar, Natalia, Maximo Rossi & Tom W. Smith. 2010. The Perception of Corruption. International Journal of Public Opinion Research

Melo, Luisa & Michael A. Quinn. 2015. Oil, Foreign Direct Investment and Corruption. International Journal of Business & Finance Research

Melo, Marcus Andre, Adailton B. Leite & E. Rocha. 2013. Municipal Corruption: Multilevel Estimates of the Effects of Checks and Political Competition in Brazil. Working paper.

Melo, Marcus Andre, Adailton Leite & Enivaldo Rocha. 2012. Competitive Corruption: Evidence from Randomized Brazilian Municipal Audits. Working paper.

Melo, Marcus Andre, Carlos Pereira & Carlos Mauricio Figueiredo. 2009. Political and Institutional Checks on Corruption: explaining the Performance of Brazilian Audit Institutions. Comparative Political Studies

Pg 1696 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Melville, Andrei, Denis Stukai & Mikhail Mironiuk. 2014. “King of the Mountain,” or Why Postcommunist Autocracies Have Bad Institutions. *Russian Social Science Review*

Memoli, Vincenzo & Alessandro Pellegata. 2013. Electoral Systems, Corruption and Satisfaction with Democracy. Working paper.

Memoli, Vincenzo & Alessandro Pellegata. 2014. Corruption and EU Institutions: The Italians’ Opinion. *Perspectives on European Politics & Society*

Menaker, Andrea J. 2010. The Determinative Impact of Fraud and Corruption on Investment Arbitrations. *ICSID Review*

Mendez, Fabio & Facundo Sepulveda. 2006. Corruption, Growth, and Political Regimes: Cross Country Evidence. *European Journal of Political Economy*

Méndez, Fabio & Facundo Sepulveda. 2009. What Do We Talk About When We Talk About Corruption? *Journal of Law, Economics & Organization*

Mendez, Fabio. 2014. Can Corruption Foster Regulatory Compliance? *Public Choice*

Mendoza, R.U., R.A. Lim & A.O. Lopez. 2015. Grease or Sand in the Wheels of Commerce? Firm Level Evidence on Corruption and SMEs. *Journal of International Development*

Mendoza, Ronald U., Ricardo A. Lim & Anne Beline C. Ong Lopez. 2013. Grease or Sand in the Wheels of Commerce? Firm Level Evidence on Corruption and SMEs. Working paper.

Menes, Rebecca. 2006. “Limiting the Reach of the Grabbing Hand: Graft and Growth in American Cities, 1880 to 1930”, in Edward L. Glaeser & Claudia Goldin eds., *Corruption and Reform: Lessons from America’s Economic History* (Chicago: University of Chicago Press)

Menezes, Flavio M. & Paulo Klinger Monteiro. 2006. Corruption and Auctions. *Journal of Mathematical Economics*

Mensah, Y.M. 2014. An Analysis of the Effect of Culture and Religion on Perceived Corruption in a Global Context. *Journal of Business Ethics*

Meny, Y. 1996. “Fin de Siecle” Corruption: Change, Crisis and Shifting Values. *International Social Science Journal*

Méon, Pierre-Guillaume & Khalid Sekkat. 2005. does Corruption Grease or Sand the Wheels of Growth? *Public Choice*.

Meon, Pierre-Guillaume & Laurent Weill. 2010. Is Corruption an Efficient Grease? *World Development*

Mesmer-Magnus, Jessica R. & Chockalingam Viswesvaran. 2005. Whistleblowing in Organizations: An Examination of Correlates of Whistleblowing Intentions, Actions, and Retaliation. *Journal of Business Ethics*.

- 1 Messick, D.M. & M.H. Bazerman. 1996. Ethical Leadership and Psychology of Decision  
2 Making. Sloan Management Review
- 3 Messick, Richard E. 2014. "Policy Considerations when Drafting Conflict of Interest  
4 Legislation", in Jean-Bernard Auby, Emmanuel Breen & Thomas Perroud eds., Corruption and  
5 Conflicts of Interest: A Comparative Law Approach
- 6 Mestre, J. 2015. A Bribe New World: The Federal Government Gets Creative in Chasing  
7 Foreign Officials for Taking Bribes. University of Florida Journal of Law & Public Policy
- 8 Meyer, B., T. van Roomen & E. Sikkema. 2014. Corporate Criminal Liability for Corruption  
9 Offences and the Due Diligence Defense: A Comparison of the Dutch and English Legal  
10 Frameworks. Utrecht Law Review
- 11 Meyer, M.E., J. Steyn & N. Gopal. 2013. exploring the Public Parameter of Police Integrity.  
12 Policing: An International Journal of Police Strategies & Management
- 13 Meyer, Olaf. 2013. "The Formation of a Transnational Ordre Public against Corruption:  
14 Lessons for and from Arbitral Tribunals", in Susan Rose-Ackerman & Paul D. Carrington eds.,  
15 Anti-Corruption Policy: Can International Actors Play a Constructive Role? (Durham: Carolina  
16 Academic Press),
- 17 Mi, Zengyu & Qiongzhi Liu. 2014. Income Inequality, Fiscal Redistribution, and  
18 Governmental Corruption: Evidence from Chinese Provincial Data. Journal of Developing Areas
- 19 Mialtu, M., C. Nedelcu & C. Banacu. 2015. The Balance of Accessing European Funds the  
20 End of 2014: The Influence of Corruption on Absorbed E.U. Funds in Romania. Management  
21 Research & Practice
- 22 Miceli, Marcia P. et al. 2008. Whistleblowing in Organizations. New York: Routledge.
- 23 Michael S. Kang. 2012. The End of Campaign Finance Law. Virginia Law Review
- 24 Michael, B. & I. Carr. 2015. How Can the ICAC Help Foster the Widespread Adoption of  
25 Company Anticorruption Programs in Hong Kong? North Carolina Journal of International Law &  
26 Commercial Regulation
- 27 Michael, B. 2004. The Rise and Fall of the Anti-Corruption Industry: Toward Second  
28 Generation Anti-Corruption Reforms in Central and Eastern Europe. New York: Open Society  
Institute.
- Michael, B. 2015. Making Hong Kong Companies Liable for Foreign Corruption. Journal of  
Financial Crime.
- Michael, Bryane. 2004. explaining Organizational Change in International Development:  
The Role of Complexity in Anti-Corruption Work. Journal of International Development
- Michael, Bryane. 2004. What Do African-Donor Sponsored Anti-Corruption Programmes  
Teach Us About International Development in Africa? Social Policy & Administration

1 Michael, Bryane. 2006. Depoliticizing Anti-Corruption in Bolivia: Local International  
2 Intervention and the State. *International Journal of Public Administration*

3 Michael, Bryane. 2010. Issues in Anti-Corruption Law: Drafting Implementing Regulations  
4 for Anti-Corruption Conventions in Central Europe and the Former Soviet Union, *Journal on  
Legislation*

5 Michael, Bryane. 2012. "Activist Regulatory Practices in Corruption Prevention: A Case  
6 Study from Montenegro", in Adam Graycar & Russell G. Smith eds., *Handbook of Global Research  
and Practice in Corruption* ,

7 Michael, Bryane. 2012. Do Customs Trade Facilitation Programs Help Reduce Customs-  
8 Related Corruption? *International Journal of Public Administration* 35: 81-97.

9 Michael, Bryane. 2014. Can the Hong Kong ICAC Help Reduce Corruption on the  
10 Mainland? *Chinese Journal of Comparative Law* 2: 78-119.

11 Michener, G. 2015. Policy Evaluation via Composite Indexes: Qualitative Lessons from  
12 International Transparency Policy Indexes. *World Development* 74: 184-196.

13 Miettinen, T. & P. Poutvaara. 2014. A Market for Connections. *European Journal of  
Political Economy*

14 Migliorisi, S. & C. Wescott. 2011. A Review of World Bank Support for Accountability  
15 Institutions in the Contract of Governance and Anti-Corruption. IEG Working Paper 2011/5  
16 (Washington D.C.: World Bank).

17 Miguel, Edward & Mary Kay Gugerty. 2005. Ethnic Diversity, Social Sanctions, and Public  
18 Goods in Kenya. *Journal of Public Economics* 89(11-12): 2325-2368.

19 Milanovic, Branko, Karla Hoff & Shale Horowitz. 2010. Turnover in Power as a Restraint  
20 on Investing in Influence: Evidence from the Postcommunist Transition. *Economics & Politics*

21 Miles, Cameron A. 2012. Corruption, Jurisdiction and Admissibility in International  
Investment Claims. *Journal of International Dispute Settlement*

22 Miles, M.R. 2015. Turnout as Consent: How Fair Governance Encourages Voter  
23 Participation. *Political Research Quarterly*.

24 Miller, Kelly D. 2002. The Hobbs Act, the Interstate Commerce Clause, and *United States v.*  
25 *McFarland*: The Irrational Aggregation of Independent Local Robberies to Sustain Federal  
Convictions. *Tulane Law Review*

26 Miller, William L. 2006 *Corruption and Corruptibility*. *World Development*

27 Miller, William L., Ase B. Grodeland & Tatyana Y. Koshechkina. 2001. *A Culture of  
28 Corruption: Coping with Government in Post-Communist Europe*. Budapest: CEU Press.

Pg 1699 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 Miller, William L., Ase B. Grodeland & Tatyana Y. Koshechkina. 2002. "Values & Norms  
2 versus Extortion & Temptation," in *Corrupt Exchanges: Empirical Themes in the Politics and the  
Political Economy of Corruption* (Donatella Della Porta & Susan Rose-Ackerman, eds.)

3 Miller, William M. 2006. "Perceptions, experience and Lies: What Measures Corruption and  
4 What Do Corruption Measures Measure?", in Charles Sampford, Arthur Shacklock, Carmel  
Connors & Fredrik Galtung eds., *Measuring Corruption* (Aldershot: Ashgate)

5 Mills, David & Robert Weisberg. 2008. *Corrupting the Harm Requirement in White Collar  
6 Crime*. Stanford Law Review

7 Milyo, J. 2014. *Corporate Influence and Political Corruption*. Independent Review .

8 Minovic, M., M. Milovanovic, V. Stavljanin, B. Draskovic & D. Lazic. 2014. *Semantic  
9 Technologies on the Mission: Preventing Corruption in Public Procurement*. Computers in  
Industry .

10 Mironov, Maxim & Ekaterina Zhuravskaya. 2012. *Corruption in Procurement and Shadow  
11 Campaign Financing: Evidence from Russia*. Unpublished manuscript.

12 Mironov, Maxim. 2005. *Bad Corruption, Good Corruption and Growth*. 2005. Working  
13 Paper, Graduate School of Business, University of Chicago.

14 Mironov, Maxim. 2015. *Should One Hire a Corrupt CEO in a Corrupt Country?* Journal of  
Financial Economics

15 Miroslav, Minovia et al. 2014. *Semantic Technologies on the Mission: Preventing  
16 Corruption in Public Procurement*. Computers in Industry

17 Misangyi, Vilmos F., G. Weaver & H. Elms. 2008. *Ending Corruption: The Interplay among  
18 Institutional Logics, Resources, and Institutional Entrepreneurs*. Academy of Management Review

19 Mishra, Ajit. 2002. *Hierarchies, Incentives and Collusion in a Model of Enforcement*.  
20 Journal of Economic Behavior & Organization

21 Mishra, Ajit. 2005. *The Economics of Corruption*. Oxford University Press.

22 Mishra, Ajit. 2006. *Persistence of Corruption: Some Theoretical Perspectives*. World  
23 Development.

24 Mishra, P., A. Subramanian & P. Topalova. 2008. *Tariffs, Enforcement, and Customs  
Evasion: Evidence from India*. Journal of Public Economics

25 Mistree, D. 2015. *Party-Directed Corruption in the Developing World*. Comparative Politics

26 Mistry, J.J. & A. Jalal. 2012. *An Empirical Analysis of the Relationship Between E-  
27 Government and Corruption*. International Journal of Digital Accounting Research .

28 Mitchell, Paul. 2000. *Voters and Their Representatives: Electoral Institutions and*

Pg 1700 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 Delegation in Parliamentary Democracies. European Journal of Policy Research

2 Mitchell, Z., S. Merrington & P. Bell. 2014. A Comparative Analysis of the OECD Anti-  
3 Corruption Models (Asia & Europe) and Australia's Existing Anti-Corruption Platform.  
International Journal of Business & Commerce.

4 Mitra, Siddhartha. 2012. Corruption Re-examined. Trade & Development Review

5 Mixon, Franklin G., Jr., David N. Laband & Robert B. Eskelund Jr.. 1994. Rent Seeking and  
6 Hidden In-Kind Resource Distribution: Some Empirical Evidence. Public Choice

7 Mizoguchi, T. & N. Van Quyen. 2014. Corruption in Public Procurement Market. Pacific  
8 Economic Review.

9 Mo, Pak Hung. 2001. Corruption and Economic Growth. Journal of Comparative Economics

10 Mocan, Naci. 2008. What Determines Corruption? International Evidence from Micro Data.  
Economic Inquiry

11 Mock, Gregory. 2003. Undue Influence: Corruption and Natural Resources. World  
12 Resources 2002-2004.

13 Modnak, J.J. 1995. Competence, Integrity and the Electoral Success of Congressional  
14 Incumbents. Journal of Politics

15 Moene, Kalle & Tina Soreide. 2015. "Good Governance Facades", in Susan Rose-Ackerman  
16 & Paul Lagunes eds., Greed, Corruption, and the Modern State

17 Mohamed, M.R., S.R. Kaliappan, N.W. Ismail & W.N.W. Azman-Saini. 2015. Effect of  
18 Foreign Aid on Corruption: Evidence from Sub-Saharan African Countries. International Journal of  
Social Economics

19 Mohammad, Ehsan. 2006. When Implementation Fails: The Case of Anti-Corruption  
20 Commission (ACC) and Corruption Control in Bangladesh. Asian Affairs

21 Mohtadi, Hamid & Terry L. Roe. 2003. Democracy, Rent Seeking, Public Spending, and  
22 Growth. Journal of Public Economics

23 Moiseienko, A. 2015. "No Safe Haven": Denying Entry to the Corrupt as a New Anti-  
Corruption Policy. Journal of Money Laundering Control

24 Mokhtari, M. & M. Ashtari. 2012. Reducing Informal Payments in the Health Care System:  
25 Evidence from a Large Patient Satisfaction Survey. Journal of Asian Economics

26 Mokhtari, Manouchehr & Irina Grafova. 2007. Corruption: Theory and Evidence from the  
27 Russian Federation. Economic Systems .

28 Molinari, M.C. 2014. A Second Best Theory of Institutional Quality. Public Organization  
Review .

Monahan, Susanne C. & Beth A. Quinn. 2006. Beyond ‘Bad Apples’ and ‘Weak Leaders’: Toward a Neo-Institutional explanation of Organizational Deviance. *Theoretical Criminology*

Monteiro, Joana & Claudio Ferraz. 2010. does Oil Make Leaders Unaccountable? Evidence from Brazil’s Offshore Oil Boom. Working paper.

Montes, G.C. & P.C. Paschoal. 2015. Corruption: What Are the Effects on Government Effectiveness? Empirical Evidence Considering Developed and Developing Countries? *Applied Economics Letters*.

Montinola, Gabriella R. & Robert W. Jackman. 2002. Sources of Corruption: A Cross-Country Study. *British Journal of Political Science*

Montinola, Gabriella R. 1994. The Foundations of Political Corruption: Insights from the Philippine Case. *Asian Journal of Political Science*

Montinola, Gabriella, Yingyi Qian & Barry R. Weingast. 1995. Federalism, Chinese Style: The Political Basis for Economic Success. *World Politics*

Moody-Stuart, George. 1994. The Good Business Guide to Bribery: Grand Corruption in Third World Development.

Moohr, Geraldine Szott. 1994. Mail Fraud and the Intangible Rights Doctrine: Someone to Watch over Us. *Harvard Journal on Legislation*

Mookherjee, Dilip & Ivan P.L. Png. 1992. Monitoring vis-à-vis Investigation in Enforcement of Law. *American Economic Review*

Mookherjee, Dilip & Ivan P.L. Png. 1995. Corruptible Law Enforcers: How Should They Be Compensated? *Economic Journal*

Moore, D.A., P.E. Tetlock, L. Tanlu & M.H. Bazerman. 2006. Conflicts of Interest and the Case of Auditor Independence: Moral Selection and Strategic Issue Cycling. *Academy of Management Review*

Moore, E.C. 2007. Causes of Demand for International Bribery. *Electronic Journal of Business Ethics & Organization Studies* :

Moore, Mick. 2001. Political Underdevelopment: What Causes “Bad Governance”?, *Public Management*

Moore, Mick. 2004. Revenue, State Formation, and the Quality of Government in Developing Countries. *International Political Science Review*

Moran, Jon. 1999. Bribery and Corruption: The OECD Convention on Combating the Bribery of Foreign Public Officials in International Business Transactions. *Business Ethics: A European Review*



Pg 1702 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Moran, Jon. 2001. Democratic Transitions and Forms of Corruption. Crime, Law & Social  
2 Change
- 3 Moroff, Holger & Diana Schmidt-Pfister. 2010. Anti-Corruption Movements, Mechanisms,  
4 and Machines – An Introduction. Global Crime
- 5 Moroff, Holger. 2004. A Polychromatic Turn in Corruption Research? Crime, Law & Social  
6 Change
- 7 Morris, C. 2015. In International Study on Public Confidence in Police. Police Practice &  
8 Research
- 9 Morris, Stephen D. & J.L. Klesner. 2010. Corruption and Trust: Theoretical Considerations  
10 and Evidence from Mexico. Comparative Political Studies
- 11 Morris, Stephen D. 1991. Corruption and Politics in Contemporary Mexico. (University of  
12 Alabama Press).
- 13 Morris, Stephen D. 2004. Corruption in Latin America: An Empirical Overview. SECOLAS  
14 Annals
- 15 Morris, Stephen D. 2008. Disaggregating Corruption: A Comparison of Participation and  
16 Perceptions in Latin America with a Focus on Mexico. Bulletin of Latin American Research
- 17 Morris, Stephen D. 2011. Forms of Corruption. CESifo DICE Report
- 18 Morrissey, David. 2007. The Fight Against Corruption by International Organizations.  
19 George Washington International Law Review
- 20 Morse, Stephen. 2006. Is Corruption Bad for Environmental Sustainability? A Cross-  
21 National Analysis. Ecology & Society
- 22 Moser, Carolyn. 2014. “Conflict of Interests of Government Members and the Risk of  
23 Corruption: An Assessment of Pre-Revolutionary Tunisia and Egypt”, in Jean-Bernard Auby,  
24 Emmanuel Breen & Thomas Perroud eds., Corruption and Conflicts of Interest: A Comparative  
25 Law Approach
- 26 Moss, T.J., G. Pettersson & N. van de Walle. 2006. An Aid-Institutions Paradox? A Review  
27 Essay on Aid Dependency and State Building in Sub-Saharan Africa. Working paper.
- 28 Moyer, Homer E., Jr. 2004. The Role of Law in Combating Official Corruption: Recent U.S.  
Enforcement and Evolving International Standards, Proceedings of the Annual Meeting (American  
Society of International Law)
- Muazu Ibrahim, Emmanuel Kumi & Thomas Yeboah. 2015. African Journal of Economic &  
Sustainable Development
- Mudhai, Fredrick. 2007. Time to Harvest? Media, Corruption and Elections in Kenya.  
International Journal of Communication Ethics



- 1 Muffler, Stephen. 1995. Proposing a Treaty on the Prevention of International Corrupt  
2 Payments: Cloning the Foreign Corrupt Practices Act Is Not the Answer. ILSA Journal of  
3 International & Comparative Law
- 4 Mukwiri, J. 2015. British Law on Corporate Bribery. Journal of Financial Crime
- 5 Mulgan, Richard & John Wanna. 2012. "Developing Cultures of Integrity in the Public and  
6 Private Sectors", in Adam Graycar & Russell G. Smith eds., Handbook of Global Research and  
7 Practice in Corruption ,
- 8 Muma, M.W. 2014. Toward Greater Guidance: Reforming the Definitions of the Foreign  
9 Corrupt Practices Act. Michigan Law Review
- 10 Mungiu-Pippidi, Alina. 2013. Becoming Denmark: Historical Designs of Corruption Control.  
11 Social Research
- 12 Mungiu-Pippidi, A. 2013. Controlling Corruption Through Collective Action. Journal of  
13 Democracy
- 14 Mungiu-Pippidi, A. 2015. Corruption: Good Governance Powers Innovation. Natur
- 15 Mungiu-Pippidi, A. et al. 2011. Contextual Choices in Fighting Corruption: Lessons  
16 Learned. Norwegian Agency for International Development.
- 17 Mungiu-Pippidi, Alina. 2005. Deconstructing Balkan Particularism: The Ambiguous Social  
18 Capital of Southeastern Europe. Southeast European & Black Sea Studies
- 19 Mungiu-Pippidi, Alina. 2006. Corruption: Diagnosis and Treatment. Journal of Democracy
- 20 Mungiu-Pippidi, Alina. 2013. The Good, the Bad and the Ugly: Controlling Corruption in  
21 the European Union. Working paper.
- 22 Mungiu-Pippidi, Alina. 2014. Of Virtuous Circles: Modeling Control of Corruption Beyond  
23 Modernization. Working paper.
- 24 Mungiu-Pippidi, Alina. 2015. The Quest for Good Governance: How Societies Develop  
25 Control of Corruption (Cambridge University Press).
- 26 Muralidharan, Karthik, Paul Niehaus & Sandip Sukhtankar. 2014. Payments Infrastructure  
27 and the Performance of Public Programs: Evidence from Biometric Smartcards in India. NBER  
28 Working Paper 19999.
- 29 Muralindharan, K. & Sundararaman, V. 2009. Teacher Performance Pay: experimental  
30 Evidence from India. (Working paper).
- 31 Murphy, Kevin et al. 1993. Why Is Rent-Seeking So Costly to Growth? American Economic  
32 Review

- 1 Murphy, Mark J. 1995. International Bribery: An Example of an Unfair Trade Practice?  
2 Brooklyn Journal of International Law
- 3 Murray, Cameron K. & Paul Frijters. 2015. Clean Money in a Dirty System: Relationship  
4 Networks and Land Rezoning in Queensland.
- 5 Murtazashvili, J. 2015. Gaming the State: Consequences of Contracting Out State Building  
6 in Afghanistan. Central Asian Survey
- 7 Musa, P.F., P. Meso & V.W. Mbarika. 2005. Toward Sustainable Adoption of Technologies  
8 for Human Development in Sub-Saharan Africa: Precursors, Diagnostics, and Prescriptions.  
9 Communications of the Association for Information Systems
- 10 Musila, Jacob W. 2013. does Democracy Have a Different Impact on Corruption in Africa?  
11 Journal of African Business
- 12 Musila, Jacob Wanjala & Simon Pierre Sigué. 2010. Corruption and International Trade: An  
13 Empirical Investigation of African Countries. World Economy
- 14 Mutebi, Alex. 2008. explaining the Failure of Thailand's Anti-Corruption Regime.  
15 Development & Change
- 16 Muzila, Lindy, Michelle Morales, Marianne Mathias & Tammar Berger. 2012. On the Take:  
17 Criminalizing Illicit Enrichment to Fight Corruption. Washington, D.C.: Stolen Asset Recovery  
18 Initiative.
- 19 Myers, Richard E. II. 2012. Who Watches the Watchers in Public Corruption Cases?  
20 University of Chicago Legal Forum 2012
- 21 Myerson, Roger B. 1993. Effectiveness of Electoral Systems for Reducing Government  
22 Corruption: A Game-Theoretic Analysis. Games & Economic Behavior
- 23 Myerson, Roger. 2006. Bipolar Multicandidate Elections with Corruption. Scandinavian  
24 Journal of Economics
- 25 Myint, U. 2000. Corruption: Causes, Consequences and Cures. Asia-Pacific Development  
26 Journal
- 27 Myles, Gareth D. & Hana Yousefi. 2015. Corruption and Seigniorage. Journal of Public  
28 Economic Theory
- Nabin, Munirul Haque & Gautam Bose. 2008. Partners in Crime: Collusive Corruption and  
Search. The B.E. Journal of Economic Analysis & Policy 8(1).
- Nadeau-Seguin, Sara. 2013. Commercial Arbitration and Corrupt Practices: Should  
Arbitrators Be Bound By a Duty to Report Corrupt Practices? Transnational Dispute Resolution  
10(3).
- Nadipuram, Abhay M. 2013. Is the OECD the Answer? It's Only Part of the Solution.

Journal of Corporation Law

Nagin, Daniel S. & Greg Pogarsky. 2003. An experimental Investigation of Deterrence: Cheating, Self-Serving Bias, and Impulsivity. *Criminology*

Naidu, S. & A. Chand. 2014. exploring the Relationship between Freedom from Corruption and Business Governance in the Oceania Region. *Quality & Quantity*

Naim, Moises. 2005. Bad Medicine: The War on Corruption Is Leaving the World Worse Than We Found It. *Foreign Policy* 147 (May-June 2005): 96-95.

Nakahara, S. 2015. Light in the Darkness: Understanding the Future Directions of Organizational Corruption. *Journal of Legal, Ethical & Regulatory Issues*

Namawu, Alolo. 2004. Fighting Public Sector Corruption in Sub-Saharan Africa: does Gender Matter? IDD Wchool of Public Policy Working Paper.

Nana, Constantine Ntsanyu. 2013. West Africa: The Actions of the OHADA Arbitral Tribunal in the Face of Corruption. *Transnational Dispute Management* 10(3).

Nappert, S. 2012. "Nailing Corruption: Thoughts for a Gardener – A Comment on World Duty Free Company Ltd v. The Republic of Kenya", in Patrick Wautelet, Thalia Kruger & Govert Coppens eds., *The Practice of Arbitration: Essays in Honour of Hans van Houtte* (Hart Publishing).

Nas, Tevtik F., Albert C. Price & Charles T. Weber. 1986. A Policy-Oriented Theory of Corruption. *American Political Science Review* 80(1):107-119.

Nasarre, Cecilia A.S. 2013. International Commercial Arbitration and Corruption: The Role and Duties of the Arbitrator. *Transnational Dispute Resolution* 10(3).

Nasuti, Peter. 2012. The Determinants of Anti-Corruption Reform in the Republic of Georgia. Working paper.

Navarro, Nelly Calderon. 2006. Fighting Corruption: The Peruvian experience. *Journal of International Criminal Justice*

Navot, D. & N. Cohen. 2015. How Policy Entrepreneurs Reduce Corruption in Israel. *Governance*.

Navot, D. 2014. The Concept of Political Corruption. *Public Integrity* .

Nawaz, S. 2015. Growth Effects of Institutions: A Disaggregated Analysis. *Economic Modelling*

Nayeri, Rouzhna. 2014. No Longer the Sleeping Dog, the FCPA Is Awake and Ready To Bite: Analysis of FCPA Enforcements, the Implications, and Recommendations for Reform. *New York International Law Review*

Ndedi, Alain A. Pr & Kingsley Kelly Mua. 2015. The Role of Forensic Investigation

Pg 1706 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 Professionals in the Prevention of Fraud and Corruption in Developing Countries. Working paper.

2 Ndikumana, Leonce & Mina Balamoune-Lutz. 2009. "Corruption and Growth in African  
3 Countries: exploring the Investment Channel", in African Development Bank & UNECA, Africa's  
4 Development Challenges and Opportunities in the Global Arena

5 Ndikumana, Leonce. 2007. "Corruption and Pro-Poor Growth Outcomes: Evidence and  
6 Lessons for African Countries", in J. Mbaku, M. Martin & J. Karugia eds., Governance and Pro-  
7 Poor Growth in Sub-Saharan Africa

8 Ndikumana, Leonce. 2013. The Private Sector as Culprit and Victim of Corruption in  
9 Africa. Working paper.

10 Neal, M., J. Finlay, S. Karkoulou, D. Catana & R. Pellegrino. 2015. How Business Students  
11 View Corruption, and Why This Should Concern Us: Insights from Lebanon, Romania and the  
12 United States. Tertiary Education & Management

13 Neeman, Zvika, M. Daniele Paserman & Avi Simhon. 2008. Corruption and Openness. B.E.  
14 Journal of Economic Analysis & Policy 8(1) (Article 50) Negro, I. 2015. "Corruption Is Dirt":  
15 Metaphors for Political Corruption in the Spanish Press. Bulletin of Hispanic Studies

16 Neild, Robert. 2012. Public Corruption: The Dark Side of Social Evolution (London:  
17 Anthem Press)

18 Nell, Mathias. 2007. Contracts Induced by Means of Bribery – Should They Be Void or  
19 Valid? Working Paper.

20 Nell, Mathias. 2007. Strategic Aspects of Voluntary Disclosure Programs for Corruption  
21 Offences: Toward a Design of Good Practice. Working Paper.

22 Nelson, Michael A. 2013. "Corruption and the Size of Local Governments: Are They  
23 Related?", in S. Lago-Penas & J. Martinez-Vazquez eds., The Challenge of Local Government Size:  
24 Theoretical Perspectives, International experience and Policy Reform (Cheltenham, U.K.: Edward  
25 Elgar)

26 Nemeroff, Michael A. 2006. The Limited Role of Campaign Finance Laws in Reducing  
27 Corruption by Elected Public Officials. Howard Law Journal

28 Neoh, Anthony. 2010. "An Impartial and Uncorrupted Civil Service: Hong Kong's Fight  
Against Corruption in the Past 35 Years", in Christopher Forsyth et al. eds. Effective Judicial  
Review: A Cornerstone of Good Government (Oxford University Press) Nesbit, Julie B. 1998.  
Transnational Bribery of Foreign Officials: A New Threat to the Future of Democracy. Vand. J.  
Transnational Law

Nesti, L. 2014. The 2010 "Agreement on Mutual Enforcement of Debarment Decisions"  
and Its Impact for the Fight against Fraud and Corruption in Public Procurement. Journal of Public  
Procurement

Neu, Dean, Jeff Everett & Abu Shiraz Rahaman. 2015. Preventing Corruption within

Government Procurement: Constructing the Disciplined and Ethical Subject. Critical Perspectives on Accounting

Neudorfer, Benjamin & Natascha S. Neudorfer. 2015. Decentralization and Political Corruption: Disaggregating Regional Authority. Publius

Neudorfer, N.S. & U.G. Theurekauf. 2014. Buying War Not Peace: The Influence of Corruption on the Risk of Ethnic War. Comparative Political Studies 47(13): 1856-1886.

Neudorfer, Natascha S. 2015. Development, Democracy and Corruption: How Poverty and Lack of Political Rights Encourage Corruption. Journal of Public Policy (forthcoming).

Neudorfer, Natascha S. N.d. Gender and Graft: A Political Economy Argument about the Influence of Working Women on Political Corruption. Journal of Women Politics & Policy (forthcoming).

Neumayer, E. 2002. Is Good Governance Rewarded? A Cross-National Analysis of Debt Forgiveness. World Development

Neumayer, E. 2003. The Determinants of Aid Allocation by Regional Multilateral Development Banks and United Nations Agencies. International Studies Quarterly

Neupane, Arjun, Jeffrey Soar & Kishor Vaidya. 2012. Evaluating the Anti-Corruption Capabilities of Public E-Procurement in a Developing Country. Electronic Journal on Information Systems in Developing Countries

Neupane, Arjun, Jeffrey Soar & Kishor Vaidya. 2014. An Empirical Evaluation of the Potential of Public E-Procurement to Reduce Corruption. Australasian Journal of Information Systems

Neupane, Arjun, Jeffrey Soar & Kishor Vaidya. 2014. The Potential of E-Procurement Technology for Reducing Corruption. International Journal of Information Technology & Management.

Neupane, Arjun, Jeffrey Soar, Kishor Vaidya & Jianming Yong. 2014. Willingness to Adopt E-Procurement to Reduce Corruption. Transforming Government: People, Process & Policy

Neverova, E.G. & O.A. Malafeyef. 2015. A Model of Interaction between Anticorruption Authority and Corruption Groups. AIP Conference Proceedings

Ng, F. & A. Yeats. 1999. Good Governance and Trade Policy: Are They the Keys to Africa's Global Integration and Growth? World Bank Policy Research Working Paper 2038.

Ngira, David Otieno. 2015. Accelerating the "War" Against Corruption: A Sociological Perspective. Working paper.

Ngo, Tak-Wing. 2009. "Rent Seeking under the Licensing State: The Institutional Sources of Economic Corruption in China", in Gong, T. & S.K. Ma eds., Preventing Corruption in Asia: Institutional Design and Policy Capacity (London: Routledge)

1 Niaz, I. 2014. Corruption and the Bureaucratic Elite in Pakistan: The 1960s and 1970s  
2 Revisited. Journal of the Royal Asiatic Society

3 Nice, David C. 1986. The Policy Consequences of Political Corruption. Political Behavior

4 Nichilo, Brian. 2011. Honest Services Fraud: Consistency in Change. Temple Law Review

5 Nichols, Philip J. 2016. The Neomercantilist Fallacy and the Contextual Reality of the  
6 Foreign Corrupt Practices Act. Harvard Journal on Legislation (forthcoming).

7 Nichols, Philip M. 1996. Corruption in the World Trade Organization: Discerning the Limits  
8 of the World Trade Organization's Authority. N.Y.U. Journal of International Law and Politics, 28:  
711-784.

9 Nichols, Philip M. 1997. Outlawing Transnational Bribery Through the World Trade  
10 Organization. Law & Policy in International Business

11 Nichols, Philip M. 1999. Are Extraterritorial Restrictions on Bribery a Viable and Desirable  
12 International Policy Goal Under the Global Conditions of the Late Twentieth Century? Increasing  
Global Security by Controlling Transnational Bribery. Mich. J. Int'l L. 20: 451-.

13 Nichols, Philip M. 1999. Regulating Transnational Bribery in Times of Globalization and  
14 Fragmentation. Yale Journal of International Law

15 Nichols, Philip M. 2000. The Myth of Anti-Bribery Laws as Transnational Intrusion.  
16 Cornell International Law Journal

17 Nichols, Philip M. 2001. The Fit Between Changes to the Global Corruption Regime and  
18 Indigenous Perceptions of Corruption in Kazakhstan. University of Pennsylvania Journal of  
International Economic Law

19 Nichols, Philip M. 2004. Corruption as an Assurance Problem. American University  
20 International Law Review

21 Nichols, Philip M. 2009. Multiple Communities and Controlling Corruption. Journal of  
22 Business Ethics

23 Nichols, Philip M. 2011. The Perverse Effect of Campaign Contribution Limits: Reducing  
the Allowable Amounts Increases the Likelihood of Corruption in the Federal Legislature.  
24 American Business Law Journal

25 Nichols, Philip M. 2012. The Business Case for Complying with Bribery Laws. American  
26 Business Law Journal.

27 Nichols, Philip M. 2012. The Psychic Costs of Violating Corruption Laws. Vanderbilt  
28 Journal of Transnational Law.

Nichols, Philip M. 2012. United States v Lazarenko: The Trial and Conviction of Two

Pg 1709 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Former Prime Ministers of Ukraine. University of Chicago Legal Forum.

Nichols, Philip M., George J. Siedel & Matthew Kasdin. 2004. Corruption as a Pan-Cultural Phenomenon: An Empirical Study in Countries at Opposite Ends of the Former Soviet Empire, 39 Tex. Int'l L.J

Nichter, Simeon. 2008. Vote Buying or Turnout Buying? Machine Politics and the Secret Ballot. American Political Science Review

Nichter, Simeon. 2011. Electoral Clientalism or Relational Clientalism? Healthcare and Sterilization in Brazil. Working paper.

Nichter, Simeon. 2014. Conceptualizing Vote Buying. Electoral Studies (forthcoming).

Niehaus, Paul & Sandip Sukhtankar. 2013. Corruption Dynamics: The Golden Goose Effect. American Economic Journal: Economic Policy

Niehaus, Paul & Sandip Sukhtankar. 2013. The Marginal Rate of Corruption in Public Programs: Evidence from India. Journal of Public Economics

Niehaus, Paul, Antonia Atanassova, Marianne Bertrand & Sendhil Mullainathan. 2013.

Targeting with Agents. American Economic Journal: Economic Policy

Nielsen, R. 2003. Corruption Networks and Implications for Ethical Corruption Reform. Journal of Business Ethics

Nielsen, Richard P. 2000. The Politics of Long Term Corruption Reform: A Combined Social Movement and Action-Learning Approach. Business Ethics

Nieto, N. 2014. Corruption in Mexico: A Historical Legacy. Social Science Diliman

Nikolaev, P. 2014. Corruption Suppression Models: The Role of Inspectors' Moral Level. Computational Mathematics & Modeling.

Nilsson Hakkala, K., P. Norback & H. Svaleryd. 2008. Asymmetric Effects of Corruption on FDI: Evidence from Swedish Multinational Firms. Review of Economics & Statistics

Nishizaki, Y. 2005. The Moral Origin of Thailand's Provincial Strongman: The Case of Banharn Silpa-Archa. South East Asia Research

Nolan, Beth. 1992. Public Interest, Private Income: Conflicts and Control Limits on the Outside Income of Government Officials. Northwestern University Law Review

Noller, Lisa M. 2012. A Modest Practitioner Proposal: Striking a Balance in Whistleblower Lawsuits. University of Chicago Legal Forum 2012: 129-150.

Noonan, John T. 1985. Bribes. New York: MacMillan.



Pg 1710 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Norad. 2011. Joint Evaluation of Support to Anticorruption Efforts, 2002-2009.
- 2 Norton, Patrick M. 2006. The Foreign Corrupt Practices Act Dilemma. *China Business*
- 3 *Review* 33 (Nov-Dec)
- 4 Nte, N.D. 2011. Police Corruption and the National Security Challenge in Nigeria: A Study
- 5 of Rivers State Police Command. *International Journal of Human Sciences* .
- 6 Nurgaliyev, B., K. Ualiyev & B. Simonovich. 2015. Police Corruption in Kazakhstan: The
- 7 Preliminary Results of the Study. *Review of European Studies*
- 8 Nur-Tegin, Kanybek & Hans J. Czap. 2012. Corruption: Democracy, Autocracy, and
- 9 Political Stability. *Economic Analysis & Policy*
- 10 Nur-egin, Kanybek & Tanya Sahin. 2013. Bribing Behavior by Firm Attributes: A Cross-
- 11 Country Analysis. *International Journal of Public Policy*
- 12 Nur-Tegin, Kanybek. 2008. Determinants of Business Tax Compliance. *The B.E. Journal of*
- 13 *Economic Analysis & Policy*
- 14 Nwabuzor, Augustine. 2005. Corruption and Development: New Initiatives in Economic
- 15 Openness and Strengthened Rule of Law. *Journal of Business Ethics* .
- 16 Nwazubor, A. 2005. Corruption and Development: New Initiatives in Economic Openness
- 17 and Strengthened Rule of Law. *Journal of Business Ethics*
- 18 Nyamu,-Musembi, C. 2007. “Gender and Corruption in the Administration of Justice”, in
- 19 Transparency International, *Global Corruption Report* (Cambridge, UK: Cambridge University
- 20 Press)
- 21 Nyblade, Benjamin & Steven Reed. 2008. Who Cheats? Who Loots? Political Competition
- 22 and Corruption in Japan, 1947-1993. *American Journal of Political Science*.
- 23 Nye, Joseph. 1967. Corruption and Political Development: A Cost-Benefit Analysis.
- 24 *American Political Science Review*
- 25 Nyhan, Brendan & M. Marit Rehavi. 2015. Tipping the Scales? Tetsting for Political
- 26 Influence on Public Corruption Prosecutions. Working paper.
- 27 Nyhan, D. 2015. Scandal Potential: How Political Context and News Congestion Affect the
- 28 President’s Vulnerability to Media Scandal. *British Journal of Political Science*
- Nystrand, M.J. 2014. Petty and Grand Corruption and the Conflict Dynamics in Northern
- Uganda. *Third World Quarterly*
- O’Donnell, Madalene. 2008. “Corruption: A Rule of Law Agenda?”, in Agnes Hurwitz with
- Reyko Huang eds., *Civil War and the Rule of Law* (Boulder: Lynne Rienner).
- O’Fallon, M.J. & K.D. Butterfield. 2005. A Review of the Empirical Ethical Decision-



1 Making Literature: 1996-2003. Journal of Business Ethics

2 O'Hara, Phillip Anthony. 2014. Political Economy of Systemic and Micro-Corruption  
3 Throughout the World. Journal of Economic Issues

4 O'Kelly, Ciaran & Melvin J. Dubnick. 2006. Taking Tough Choices Seriously: Public  
5 Administration and Individual Moral Agency. Journal of Public Administration Research Theory

6 O'Leary, Cornelius. 1962. The Elimination of Corrupt Practices in British Elections, 1868-  
7 1911. Oxford: Clarendon Press.

8 O'Sullivan, Julie. 1996. The Independent Counsel Statute: Bad Law, Bad Policy. American  
9 Criminal Law Review

10 O'Toole, C.M. & F. Tarp. 2014. Corruption and the Efficiency of Capital Investment in  
11 Developing Countries. Journal of International Development

12 O'Toole, Conor M. & Finn Tarp. 2012. Corruption and the Efficiency of Capital Investment  
13 in Developing Countries. Working Paper.

14 Oarhe, O. 2014. Whither the Ivory Tower? Corruption and the Development of Higher  
15 Education in Nigeria. Africa Education Review

16 Obala, L.M. & M. Mattingly. 2014. Ethnicity, Corruption and Violence in Urban Land  
17 Conflict in Kenya. Urban Studies

18 Oberoi, Roopinder. 2014. Mapping the Matrix of Corruption: Tracking the Empirical  
19 Evidences and Tailoring Responses. Journal of Asian & African Studies

20 Obidzinski, K. & K. Kusters. 2015. Formalizing the Logging Sector in Indonesia: Historical  
21 Dynamics and Lessons for Current Policy Initiatives. Society & Natural Resources

22 Obolonskii, Aleksandr & Aleksei Barabashev. 2014. How to Clean Out the Augean Stable  
23 of Our Bureaucracy. Russian Politics & Law

24 Obydenkova, Anastassia & Alexander Libman. 2015. Understanding the Survival of Post-  
25 Communist Corruption in Contemporary Russia: The Influence of Historical Legacies. Post-Soviet  
26 Affairs.

27 Ocheje, D. Paul. 2000. Law and Social Change: A Socio-Legal Analysis of Nigeria's  
28 Corrupt Practices and Other Related Offenses Act, 2000. Journal of African Law

Ocheje, Paul D. 2000. Refocusing International Law on the Quest for Accountability in  
Africa: The Case Against "Other" Impunity. Leiden Journal of International Law

Ocheni, Stephen & Basil C. Nwankwo. 2012. The Effectiveness of Anti-Corruption  
Agencies in Enhancing Good Governance and Sustainable Developmental Growth in Africa: The  
Nigerian Paradox under Obasanjo Administration, 2003-2007. Canadian Social Science

Pg 1712 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Ochulor, Chinenye Leo. 2011. Ethical and Moral Implications of Corruption. Canadian Social Science.

Ockey, J. 2003. Change and Continuity in the Thai Political Party System. Asian Survey

Odd-Helge Fjeldstad. 2005. Revenue Administration and Corruption. (Bergen: Chr. Michelsen Institute, U4 Issue no. 2).

Odumosu, Ibrionke T. 2011. International Investment Arbitration and Corruption Claims: An Analysis of World Duty Free v. Kenya. Law & Development Review

Oduor, Jacinta Ayango et al. 2013. Left out of the Bargain: Settlements in Foreign Bribery Cases and Implications for Asset Recovery. Washington, D.C.: Stolen Asset Recovery Initiative. OECD/StAR. 2012. Identification and Quantification of the Proceeds of Bribery.

Offe, Claus. 2004. "Political Corruption. Conceptual and Practical Issues," in S. Rose-Ackerman & J. Kornai, eds. Building a Trustworthy State in Post-Socialist Transition (New York: Palgrave/Macmillan)

Offer, Avner. 1997. Between the Gift and the Market: The Economy of Regard. Economic History Review.

Ofosu-Amaah, W. Paati, Raj Soopramenien & Kishor Raj. 1999. Combating corruption: A comparative review of selected legal aspects of state practice and major international initiatives. Washington, D.C.: World Bank.

Ogan, Pekin. 1995. Predicting Noncompliance with the Foreign Corrupt Practices Act. Bus. & Prof. Ethics

Oge, K. 2014. The Limits of Transparency Promotion in Azerbaijan: External Remedies to "Reverse the Curse". Europe-Asia Studies

Ogunbamila, Bolanle & I. Bola Udegbe. 2014. Gender Differences in the Effects of Perception of Organizational Injustice on Workplace Reactivity. Europe's Journal of Psychology

Ogunyemi, K. 2014. How Extortion Works (Evidence from Nigeria): The Extortion Cycle. Business & Professional Ethics Journal

Ogwang, T. & D. Cho. 2014. A Conceptual Framework for Constructing a Corruption Diffusion Index. Journal of Business Ethics

Ohnesorge, John K.M. 1999. "Ratch"eting up the Anti-Corruption Drive: Could a Look at Recent History Cure a Case of Theory-Determinism. Connecticut Journal of International Law

Ojha, Amitabh & Shailendra C. Jain Palvia. 2012. E-Government and the Fight Against Corruption: Conceptula Model and Five Case Studies from India. Journal of Information Technology & Application Research

Ojha, Amitabh, Shailendra Palvia & M.P. Gupta. 2008. "A Model for Impact of E-

Pg 1713 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Government on Corruption: exploring Theoretical Foundations,” in J. Bhattacharya ed., Critical
- 2 Thinking in Governance (New Delhi: Gift Publishing),
- 3 Okada, Keisuke & Sovannroeun Samreth. 2012. The Effect of Foreign Aid on Corruption: A
- 4 Quantile Regression Approach. Economics Letters
- 5 Okada, Keisuke & Sovannroeun Samreth. 2014. How does Corruption Influence the Effect
- 6 of Foreign Direct Investment on Economic Growth? Global Economic Review
- 7 Okafor, G. 2015. Locational Determinants of US Outward FDI into Sub-Saharan Africa.
- 8 Journal of Developing Areas
- 9 Okeahalam, C.C. & I. Bah. 1998. Perceived Corruption and Investment in Sub-Saharan
- 10 Africa. South African Journal of Economics
- 11 Okojie, Paul & Abubakar Momoh. 2007. “Corruption and Reform in Nigeria”, in Sarah
- 12 Bracking ed., Corruption and Development: The Anti-Corruption Campaigns (Palgrave Macmillan)
- 13 Olaniyan, Kolawole. 2014. Corruption and Human Rights Law in Africa (Oxford: Hart
- 14 Publishing).
- 15 Olatunde, J.O. 2014. does Democracy Breed Accountability? The Role of State Executives
- 16 in Nigeria, 1999-2007. International Journal of Critical Accounting 4(3): .
- 17 Olaya, Juanita, Kodjo Attisso & Anja Roth. 2010. Repairing Social Damage Out of
- 18 Corruption Cases: Opportunities and Challenges as Illustrated in the Alcatel Case in Costa Rica.
- 19 Working Paper.
- 20 Oldenburg, Philip. 1987. Middlemen in Third-World Corruption: Implication of an Indian
- 21 Case. World Politics
- 22 Olen, Jared W. 2012. The Devil’s in the Intent: does 18 U.S.C. §666 Require Proof of Quid-
- 23 Pro-Quo Intent? Southwestern Law Review.
- 24 Oliva, P. 2015. Environmental Regulations and Corruption: Automobile Emissions in
- 25 Mexico City. Journal of Political Economy
- 26 Oliver, Dawn. 1997. Regulating the Conduct of MPs: The British experience of Combating
- 27 Corruption. Political Studies
- 28 Olivier de Sardan, J.P. 1999. A Moral Economy of Corruption in Africa? Journal of Modern
- African Studies
- Olken, Benjamin & Patrick Barron. 2009. The Simple Economics of Extortion: Evidence
- from Trucking in Aceh. Journal of Political Economy
- Olken, Benjamin A. & Rohini Pande. 2012. Corruption in Developing Countries. Annual
- Review of Economics.

Pg 1714 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Olken, Benjamin A. 2010. Direct Democracy and Local Public Goods: Evidence from a  
2 Field experiment in Indonesia. American Political Science Review
- 3 Olken, Benjamin. 2006. Corruption and the Costs of Redistribution: Micro Evidence from  
4 Indonesia. Journal of Public Economics
- 5 Olken, Benjamin. 2007. Monitoring Corruption: Evidence from a Field experiment in  
6 Indonesia. Journal of Political Economy.
- 7 Olken, Benjamin. 2009. Corruption Perceptions v. Corruption Reality. Journal of Public  
8 Economics
- 9 Olken, Benjamin. 2009. Do TV and Radio Destroy Social Capital? Evidence from  
10 Indonesian Villages. American Economic Journal: Applied Economics
- 11 Olowu, Dele. 1993. Roots and Remedies of Governmental Corruption in Africa. Corruption  
12 & Reform
- 13 Olsen, T. & G. Torsvik. 1998. Collusion and Renegotiation in Hierarchies: A Case of  
14 Beneficial Corruption. International Economic Review
- 15 Oluwaniyi, O.O. 2011. Police and the Institution of Corruption in Nigeria. Policing &  
16 Society
- 17 Omotoso, F. 2014. Public-Service Ethics and Accountability for Effective Service Delivery  
18 in Nigeria. Africa Today
- 19 Onoshchenko, O. & C.C. Williams. 2014. Evaluating the Role of Blat in Finding Graduate  
20 Employment in Post-Soviet Ukraine: The “Dark Side” of Job Recruitment? Employee Relations
- 21 Oquendo, Angel Ricardo. 1999. Corruption and Legitimation Crises in Latin America.  
22 Connecticut Journal of International Law
- 23 Oral, B. & F. Sayin. 2015. Can Corruption Be Prevented by Increasing Tax Auditing in  
24 Turkey? Journal of Economic Cooperation & Development
- 25 Organisation for Economic Cooperation and Development. 2008. Specialised Anti-  
26 Corruption Institution: Review of Models.
- 27 Orjuela, C. 2014. Corruption and Identity Politics in Divided Societies. Third World  
28 Quarterly
- Ortega, B., A. Casquero & J. Sanjuan. 2014. Growth in Human Development: The Role of  
Corruption. Journal of International Development
- Osei, Philip Duku. 2007. “Corruption Scandals and Anti-Corruption Institution Building  
Interventions in Jamaica”, in Sarah Bracking ed., Corruption and Development: The Anti-  
Corruption Campaigns (Palgrave Macmillan)

Pg 1715 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Osei-Hwedie, B.Z. & K. Osei-Hwedie. 2000. The Political, Economic and Cultural Bases of Corruption in Africa, in K.R. Sr., Hope & B. Chikulo eds., Corruption and Development in Africa (London, Palgrave)

Osei-Tutu, E., K. Offei-Nyako, C. Ameyaw & K.T. Ampofo. 2014. Conflict of Interest and Related Corrupt Practices in Public Procurement in Ghana. International Journal of Civil Engineering Construction & Estate Management-.

Osifo, Omoregie Charles. 2014. An Ethical Governance Perspective on Anti-Corruption Policies and Procedures: Agencies and Trust in Cameroon, Ghana, and Nigeria Evaluation. International Journal of Public Administration

Osipian, Ararat L. 2009. Corruption and Reform in Higher Education in Ukraine. Canadian & International Education

Osipian, Ararat L. 2012. Economics of Corruption in Doctoral Education: The Dissertations Market. Econoimcs of Education Review

Osipian, Ararat L. 2014. Will Bribery and Fraud Converge? Comparative Corruption in Russia and the USA. Compare: A Journal of Comparative & International Education.

Osipian, Ararat. 2010. Corrupt Organizational Hierarchies in the Former Soviet Bloc. Transition Studies Review

Oskembayev, Yessengali, Mesut Yilmaz & Kanat Abdulla. 2013. Resource Concentration, Institutional Quality and the Natural Resource Curse. Economic Systems

Osoba, Segun. 1996. Corruption in Nigeria: Historical Perspectives. Review of African Political Economy

Osterfeld, David. 1988. The Impact of Corruption on Third World Development. Economic Affairs

Ostergaard, Clemens Stubbe & Christina Petersen. 1991. Official Profiteering and the Tiananmen Square Demonstrations in China. Corruption and Reform.

Ostler, J. 2014. Corrupt Business Practices as a Market Entry Strategy. Academy of Management Proceedings .

Otahal, T. 2014. Mises, Hayek and Corruption. Journal of Business Ethics.

Oto-Peralias, D., D. Romero-Avila & C. Usabiaga. 2013. does Fiscal Decentralization Mitigate the Adverse Effects of Corruption on Public Deficits? European Journal of Political Economy.

Ott, Jan C. 2010. Good Governance and Happiness in Nations: Technical Quality Precedes Democracy and Quality Beats Size. Journal of Happiness Studies

Otusanya, O.J., S. Lauwo, O.J. Ige & O.S. Adelaja. 2015. Sweeping It Under the Carpet:

Pg 1716 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 The Role of Legislators in Corrupt Practice in Nigeria. *Journal of Financial Crime* 22(3): 354-377.

2 Ouma, S.O.A. 1991. Corruption in Public Policy and Its Impact on Development: The Case  
3 of Uganda Since 1979. *Public Administration & Development*.

4 Ouzounov, Nikolay A. 2004. Facing the Challenge: Corruption, State Capture and the Rule  
5 of Multinational Business. *John Marshall Law Review*

6 Oyamada, E. 2015. Anti-Corruption Measures the Japanese Way: Prevention Matters. *Asian  
7 Education & Development Studies*

8 Oyamada, Eiji. 2005. President Gloria Macapagal-Arroyo's Anti-Corruption Strategy in the  
9 Philippines: An Evaluation. *Asian Journal of Political Science*

10 Oye, N. 2013. Reducing Corruption in African Developing Countries: The Relevance of E-  
11 Governance. *Greener Journal of Social Sciences*

12 Ozturk, I. & U. Al-Mulali. 2015. Investigating the Validity of the Environmental Kuznets  
13 Curve Hypothesis in Cambodia. *Ecological Indicators*

14 Pacini, Carl, Mushfiq Swaleheen & Katherine Baker. 2012. Enhanced Enforcement of the  
15 Foreign Corrupt Practices Act: Improving the Ethics of U.S. Business Practices Abroad. *Research  
16 on Professional Responsibility & Ethics in Accounting*

17 Pacini, Carl. 2012. The Foreign Corrupt Practices Act: Taking a Bite Out of Bribery in  
18 International Business Transactions. *Fordham Journal of Corporate & Financial Law*

19 Pacoy, Emilia P. 2008. Tracking Anti-Corruption Initiatives: Perceptions and experiences in  
20 the Philippines. *Journal of Administration & Governance*

21 Padro i Miquel, G. 2007. The Control of Politicians in Divided Societies: The Politics of  
22 Fear. *Review of Economic Studies*

23 Paik, W. & R. Baum. 2014. Clientalism with Chinese Characteristics: Local Patronage  
24 Networks in Post-Reform China. *Political Science Quarterly*

25 Painter, Martin. 2006. Thaksinisation or Managerialism? Reforming the Thai Bureaucracy.  
26 *Journal of Contemporary Asia*

27 Painter, Martin. 2014. Myths of Political Independence, or How Not to Solve the Corruption  
28 Problem: Lessons for Vietnam. *Asia & the Pacific Policy Studies*

Painter, Richard W. 2009. *Getting the Government America Deserves: How Ethics Reform  
Can Make a Difference*. Oxford: Oxford University Press.

Paldam, M. & E. Gundlach. 2008. Two Views on Institutions and Development: The Grand  
Transition vs the Primacy of Institutions. *Kyklos*

Paldam, Martin. 2001. Corruption and Religion: Adding to the Economic Model. *Kyklos*

1 Paldam, Martin. 2002. The Cross-Country Pattern of Corruption: Economics, Culture and  
2 the Seesaw Dynamics. *European J. of Pol. Econ.*

3 Paler, L. 2013. Keeping the Public Purse: An experiment in Windfalls, Taxes, and the  
4 Incentives to Restrain. *American Political Science Review*

5 Palmier, Leslie. 2000. Corruption and Probity. *Asian Journal of Political Science* 8: 1-.

6 Pande, Rohini. 2008. Understanding Political Corruption in Low Income Countries.  
7 *Handbook of Development Economics*

8 Pande, Rohini. 2011. Can Informed Voters Enforce Better Governance? experiments in  
9 Low-Income Democracies. *Annual Review of Economics*

10 Pangalangan, Raul C. 2010. "The Philippines 'Sandiganbayan': Anti-Graft Courts and the  
11 Illusion of Self-Contained Anti-Corruption Regimes", in Andrew Harding & Penelope Nicholson  
12 eds., *New Courts in Asia* (London: Routledge)

13 Pani, M. 2011. Hold Your Nose and Vote: Corruption and Public Decisions in a  
14 Representative Democracy. *Public Choice*

15 Panizza, Ugo. 2001. Electoral Rules, Political Systems, and Institutional Quality. *Economics  
16 & Politics*

17 Pantzalis, C. & J.C. Park. 2014. Too Close for Comfort? Geographic Propinquity to Political  
18 Power and Stock Returns. *Journal of Banking & Finance*

19 Papaioannou, K. & J. Van Zanden. 2015. The Dictator Effect: How Long Years in Office  
20 Affect Economic Development. *Journal of Institutional Economics*

21 Pappa, E., R. Sajedi & E. Vella. 2014. Fiscal Consolidation with Tax Evasion and  
22 Corruption. *Journal of International Economics* (forthcoming).

23 Pappa, E., R. Sajedi & E. Vella. 2015. Fiscal Consolidation with Tax Evastion and  
24 Corruption. *Journal of International Economics*

25 Papyrakis, Elissaios & Pak Hung Mo. 2014. Fractionalization, Polarization, and Economic  
26 Growth: Identifying the Transmission Channels. *Economic Inquiry*

27 Parboteeah, K.P., H.T. Seriki & Martin Hoegl. 2014. Ethnic Diversity, Corruption and  
28 Ethical Climates in Sub-Saharan Africa: Recognizing the Significance of Human Resource  
Management. *International Journal of Human Resource Management*

Parchomovsky, Gideon & Peter Siegelman. 2009. Bribes vs. Bombs: A Study in Coasean  
Warfare. *International Review of Law & Economics*

Pardo, I. ed. 2004. Between Morality and the Law: Corruption, Anthropology and  
Comparative Society. Aldershot: Ashgate.



- 1 Paris, Timotheee. 2014. “Is (French) Continental Law Efficient at Fighting Conflicts of  
2 Interest?”, in Jean-Bernard Auby, Emmanuel Breen & Thomas Perroud eds., Corruption and  
3 Conflicts of Interest: A Comparative Law Approach
- 4 Park, Adam W. 2013. Keep Your Eye on the Bribe: Focusing FCPA Enforcement. Journal  
5 of Law, Economics & Policy
- 6 Park, Hoon. 2003. Determinants of Corruption: A Cross-National Analysis. Multinational  
7 Business Review
- 8 Park, Junghee. 2012. Corruption, Soundness of the Banking Sector, and Economic Growth:  
9 A Cross-Country Study. Journal of International Money and Finance
- 10 Parker, Christine & Vibeke Lehmann Nielsen. 2009. Corporate Compliance Systems: Could  
11 They Make Any Difference? Administration & Society
- 12 Parker, Christine & Vibeke Nielsen. 2009. The Challenge of Empirical Research on  
13 Business Compliance in Regulatory Capitalism. Annual Review of Law & Social Science
- 14 Parry, J. 2000. “The Crisis of Corruption and the Idea of India – a Worm’s Eye View”, in  
15 Pardo, I. ed. Morals of Legitimacy: Between Agency and System. Oxford: Berghahn Books.
- 16 Parsons, Christopher A., Johan Sulaeman & Sheridan Titman. 2014. Swimming Upstream:  
17 Struggling Firms in Corrupt Cities. Working paper.
- 18 Partasides, Costantine. 2010. Proving Corruption in International Arbitration: A Balanced  
19 Standard for the Real World. ICSID Review
- 20 Partridge, Hilary. 1995. Can the Leopard Change Its Spots? Sleaze in Italy. Parliamentary  
21 Aff..
- 22 Pascual-Ezama, D., T.R. Fosgaard, J.C. Cardenas, P. Kujal, R. Veszteg, B.G. Liano & P.
- 23 Pranas-Garza. 2015. Context-Dependent Cheating: experimental Evidence from 16  
24 Countries. Journal of Economic Behavior & Organization (forthcoming).
- 25 Passas, Nikos. 2006. A Comparative Analysis of National Anti-Corruption Legislation and  
26 Programmes. New York: UNDP.
- 27 Passas, Nikos. 2010. Anti-Corruption Agencies and the Need for Strategic Approaches.  
28 Crime, Law & Social Change 53(1):
- Pathak, R., G. Singh, R. Belwal, R. Naz & R. Smith. 2008. E-Governance, Corruption and  
Public Service Delivery: A Comparative Study of Fiji and Ethiopia. Journal of Administration &  
Governance
- Pathak, R.D., G. Singh, R. Belwal & R.F.I. Smith. 2007. E-Governance and Corruption —  
Developments and Issues in Ethiopia. Public Organization Review



1 Pathak, R.D., R. Naz, M.H. Rahman, R.F.I. Smith & K.N. Agarwai. 2009. E-Governance to  
2 Cut Corruption in Public Service Delivery: A Case Study of Fiji. International Journal of Public  
Administration

3  
4 Pattie, Charles & Ron Johnston. 2012. The Electoral Impact of the UK 2009 MPs' expenses  
Scandal. Political Studies.

5 Paul, B.P. 2010. does Corruption Foster Growth in Bangladesh? International Journal of  
6 Development Issues

7 Paulus, M. & L. Kristoufek. 2015. Worldwide Clustering of the Corruption Perception.  
8 Physica A

9 Pauwelyn, Joost. 2013. "Different Means, Same End: The Contribution of Trade and  
Investment Treaties to Anti-Corruption Policy", in Susan Rose-Ackerman & Paul D.

10 Carrington eds., Anti-Corruption Policy: Can International Actors Play a Constructive Role?  
11 (Durham: Carolina Academic Press)

12 Pavel, J. & S. Risticova. 2015. Analysis of Relationship Between Indicators of the Public  
13 Procurement Market and the Level of Perceived Corruption in EU Member States. Econonicky  
Casopis

14 Pavlova, E. 2015. The Russian Federation and European Union Against Corruption: A  
15 Slight Misunderstanding? Perspectives on European Politics & Society .

16 Pazmandy, Matthias. 2011. Socio-Economic Influences on Corruption Perception –  
17 Empirical Evidence from 27 European Countries. Hamburg Review of Social Sciences

18 Pearlman, S. 2014. Officials versus Theives: Is Public or Private expropriation More  
19 Harmful to Small Firms? Journal of Development Studies

20 Pearson, Zoe. 2001. An International Human Rights Approach to Corruption, in Peter  
Larmour & Nick Wolanin eds., Corruption and Anti-Corruption (Canberra: Asia Pacific Press).

21 Pearson, Zoe. 2001. Human Rights and Corruption. Canberra: Centre for Democratic  
22 Institutions.

23 Pecujilija, M., I. Cosic, L.Nesic-Grubic & S. Drobnjak. 2015. Corruption: Engineers Are  
24 Victims, Perpetrators or Both? Science & Engineering Ethics

25 Pedersen, Eric M. 2008. The Foreign Corrupt Practices Act and Its Application to U.S.  
26 Business Operations in China. Journal of International Business & Law

27 Peiffer, C. & R. Rose. 2014. Why Do Some Africans Pay Bribes While Other Africans  
Don't? Afrobarometer Working Paper 148.

28 Peiffer, Caryn & Richard Rose. 2013. Why Do Africans Differ in Paying Bribes?

Peiffer, Caryn. 2012. From Islands of Integrity to Understanding the Politics of Corruption Reduction. DLP Research Paper 21.

Peisakhin, Leonid & Paul Pinto. 2010. Is Transparency an Effective Anti-Corruption Strategy? Evidence from a Field experiment in India. Regulation & Governance

Peisakhin, Leonid V. 2011. "Field experimentation and the Study of Corruption", in Susan Rose-Ackerman & Tina Soreide eds., International Handbook on the Economics of Corruption, vol. 2 (Cheltenham: Edward Elgar Publishing)

Peisakhin, Leonid. 2011. Transparency and Corruption: Evidence from India. Journal of Law & Economics

Pellegata, Alessandro. 2009. Democracy, Government Alternation and Political Corruption. GSSEPS Working Paper Series, 6/2009.

Pellegata, Alessandro. 2013. Constraining Political Corruption: An Empirical Analysis of the Impact of Democracy. Democratization

Pellegrini, Lorenzo & Reyer Gerlagh. 2004. Corruption's Effect on Growth and Its Transmission Channels. Kyklo

Pellegrini, Lorenzo & Reyer Gerlagh. 2006. Corruption and Environmental Policies: What Are the Implications for the Enlarged EU? European Environment

Pellegrini, Lorenzo & Reyer Gerlagh. 2006. Corruption, Democracy, and Environmental Policy: An Empirical Contribution to the Debate. Journal of Environment & Development

Pellegrini, Lorenzo & Reyer Gerlagh. 2008. Causes of Corruption: A Survey of Cross-Country Analyses and Extended Results. Economics of Governance

Pendergast, Shannon M., Judith A. Clarke & G. Cornelis van Kooten. 2011. Corruption, Development, and the Curse of Natural Resources. Canadian Journal of Political Science

Pensute, Chanintorn. 2014. Vote Buying and Violence in Thai Provincial Elections.

Pepinsky, H. 1992. Corruption, Bribery and Patriarchy in Tanzania. Crime, Law & Social Change

Pereira, C. & M. Melo. 2016. Reelecting Corrupt Incumbents in Exchange for Public Goods: Rouba mas Faz in Brazil. Latin American Research Review 51(1) (forthcoming).

Pereira, Carlos & Lucia S.G. Barros. 2015. Tolerance of Corruption or Ideological Blindness? Working paper.

Pereira, Carlos, Marcus Andre Melo & Carlos Mauricio Figueiredo. 2009. The Corruption-

Pg 1721 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Enhancing Role of Re-Election Incentives? Counterintuitive Evidence from Brazil’s Audit Reports. Political Research Quarterly

Perez, M. Fabricio, Josef C. Brada & Zdenek Drabek. 2012. Illicit Money Flows as Motives for FDI. Journal of Comparative Economics

Persily, Nathaniel & Kelli Lammie. 2004. Perceptions of Corruption and Campaign

Finance: When Public Opinion Determines Constitutional Law, University of Pennsylvania Law Review,

Persson, Anna & Bo Rothstein. 2015. It’s My Money: Why Big Government May Be Good Government. Comparative Politics

Persson, Anna & Martin Sjostedt. 2012. “State Legitimacy and the Corruptibility of Leaders,” in B. Rothstein & S. Holmberg, eds. Good Government: The Relevance of Political Science (Edward Elgar Publishing).

Persson, Anna, Bo Rothstein & Jan Teorell. 2012. “Rethinking the Nature of the Grabbing Hand,” in B. Rothstein & S. Holmberg, eds. Good Government: The Relevance of Political Science (Edward Elgar Publishing).

Persson, Anna, Bo Rothstein & Jan Teorell. 2013. Why Anticorruption Reforms Fail—Systemic Corruption as a Collective Action Problem. Governance

Persson, Torsten & Guido Tabellini. 2003. The Economic Effects of Constitutions (MIT Press)

Persson, Torsten, Guido Tabellini & Francesco Trebbi. 2003. Electoral Rules and Corruption. Journal of the European Economic Association

Petermann, Andrea, Juan Ignacio Guzman & John E. Tilton. 2007. Mining and Corruption. Resources Policy

Peters, John & Susan Welch. 1980. The Effects of Charges of Corruption on Voting Behavior in Congressional Elections. Am. Pol. Sci.

Petrou, A. 2014. Bank Foreign Affiliate Performance in the Face of Pervasive and Arbitrary Corruption. European Management Review 1

Petrou, A.P. 2014. The “Grabbing Hand” or the “Helping Hand” View of Corruption: Evidence from Bank Foreign Market Entries. Journal of World Business

Petrou, Andreas P. 2015. Arbitrariness of Corruption and Foreign Affiliate Performance: A Resource Dependence Perspective. Journal of World Business

Petrovsky, Nicolai, Claudia V. Avellaneda & Priyam Saharia. 2010. does Managerial Quality Determine Whether Easy Money Will Increase Organizational Slack? Testing the Rentier Hypothesis in Colombian Local Governments. Working paper.

Petrovsky, Nicolai. 2004. does Natural Resource Wealth Spoil and Corrupt Governments? A New Test of the Resource Curse Thesis. Working paper.

Petty, Aaron. 2006. How Qui Tam Actions Could Fight Public Corruption. University of Michigan Journal of Law Reform

Pevehouse, Jon. 2010. International Institutions and the Rule of Law: The Case of National Corruption. Working paper.

Pharr, Susan. 2002. "Public Trust and Corruption in Japan," in Arnold Heidenheimer & Michael Johnston, eds. Political Corruption, Concepts and Contexts, 3rd edition (New Brunswick: Transaction Publishers)

Phillips, T.J. 2015. The Federal Common Law of Successor Liability and the Foreign Corrupt Practices Act. William & Mary Business Law Review

Philp, M. & E. David-Barrett. 2015. Realism About Political Corruption. Annual Review of Political Science

Philp, M. 2014. New Advances in experimental Research on Corruption. Political Studies Review

Philp, Mark. 1997. Defining Political Corruption. Political Studies

Philp, Mark. 2006. "Corruption Definition and Measurement," in Charles Sampford, Arthur Shacklock, Carmel Connors & Fredrik Galtung eds., Measuring Corruption (Aldershot: Ashgate)

Philp, Mark. 2008. Peacebuilding and Corruption. International Peacekeeping

Philp, Mark. 2015. "The Definition of Political Corruption", in Paul M. Heywood ed., The Routledge Handbook of Political Corruption (New York: Routledge)

Picur, Ronald D. & Ahmed Riahi-Belkaoui. 2006. The Impact of Bureaucracy and Corruption on Tax Compliance. Review of Accounting and Finance 2

Pierce, S. 2006. Looking Like a State: Colonialism and the Discourse of Corruption in Northern Nigeria. Comparative Studies in Society and History

Pieroni, Luca & Giorgio d'Agostino. 2009. Military Spending, Corruption and Economic Growth. Peace Economics, Peace Science & Public Policy

Pieroni, Luca & Giorgio d'Agostino. 2013. Corruption and the Effects of Economic Freedom. European Journal of Political Economy

Pierre, N. 2015. Foreign Direct Investment: Rule of Law and Corruption. Asia-Pacific Journal of Financial Studies

Pieth, Mark et al., eds. 2007. The OECD Convention on Bribery: A Commentary.

Cambridge: Cambridge University Press.

Pieth, Mark. 2013. "From Talk to Action: The OECD experience", in Susan Rose-Ackerman & Paul D. Carrington eds., *Anti-Corruption Policy: Can International Actors Play a Constructive Role?* (Durham: Carolina Academic Press)

Pietrzyk-Reeves, Dorota. 2006. *Corruption and Democratization: A Civic Republican View*. Acta Politica

Piga, Gustavo. 2011. "A Fighting Chance Against Corruption in Public Procurement?", in *International Handbook on the Economics of Corruption*, Vol. II. (Edward Elgar Publishing).

Pillay, Soma & Nirmala Dorasamy. 2010. *Linking Cultural Dimensions with the Nature of Corruption: An Institutional Theory Perspective*. *International Journal of Cross Cultural Management*

Pillay, Soma & Ron Kluvers. 2014. *An Institutional Theory Perspective on Corruption: The Case of a Developing Democracy*. *Financial Accountability & Management*

Pina, V., L. Torres & S. Royo. 2007. *Are ICTs Improving Transparency and Accountability in the EU Regional and Local Governments?: An Empirical Study*. *Public Administration*

Pines, Daniel. 1994. *Amending the Foreign Corrupt Practices Act to Include a Private Right of Action*. *California Law Review*.

Pino, N.W. & L.M. Johnson. 2011. *Police Deviance and Community Relations in Trinidad and Tobago*. *Policing: An International Journal of Police Strategies & Management*

Pinto, Jonathan, Carrie R. Leana & Frits K. Pil. 2008. *Corrupt Organizations or Organizations of Corrupt Individuals? Two Types of Organization-Level Corruption*. *Academy of Management Review*

Pinto, Pablo M. & Boliang Zhu. 2013. *Fortune or Evil? The Effect of Inward Foreign Direct Investment on Corruption*. Working paper.

Piplica, D. 2015. *Corruption and Political Viewpoint of the Governments in Transition Countries/EU Members*. *Asian Economic & Financial Review*

Piquero, Nicole Leeper & Jay S. Albanese. 2012. "The Relationship between Corruption and Financial Crime", in Adam Graycar & Russell G. Smith eds., *Handbook of Global Research and Practice in Corruption* ,

Pitlik, H., B. Frank & M. Firchow. 2010. *The Demand for Transparency: An Empirical Note*. *Review of International Organizations*

Plummer, Janelle. 2012. *Diagnosing Corruption in Ethiopia* (Washington, D.C.: World Bank).

Podobnik, B., J. Shao, D. Njavro, P.C. Ivanov & H.E. Stanley. 2008. *Influence of*

Pg 1724 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Corruption on Economic Growth Rate and Foreign Investment. European Physics Journal

Poeschi, G. & R. Ribiero. 2012. Everyday Opinions on Grand and Petty Corruption: A Portugueses Study. Working paper.

Pogge, Thomas. 2005. Recognized and Violated by International Law: The Human Rights of the Global Poor. Leiden Journal of International Law

Poirson, H. 1998. Economic Security, Private Investment, and Growth in Developing Countries. IMF Working Paper 98/4.

Poisson, Muriel. 2013. "Grabbing in the Education Sector", in Soreide, Tina & Aled Willams eds., Corruption, Grabbing and Development .

Polese, A. 2014. Informal Payments in Ukranian Hospitals: On the Boundary between Informal Payments, Gifts, and Bribes. Anthropological Forum

Polinsky, A. Mitchell & Steven Shavell. 2001. Corruption and Optimal Law Enforcement. Journal of Public Economics

Polishchuk, Leonid I. 2004. "Decentralization in Russia: Impact on Quality of Governance", in Mwangi S. Kimenyi & Patrick Meagher eds., Devolution and Development: Governance Prospects in Decentralizing States. (Ashgate).

Pollack, B.J. & A.W. Reisinger. 2014. Lone Wolf or the Start of a New Pack: Should the FCPA Guidance Represent a New Paradigm in Evaluating Corporate Criminal Liability Risks? American Criminal Law Review

Pollack, Benny & Ann Matear. 1997. Dictatorship, Democracy and Corruption in Chile. Crime, Law & Social Change

Polzer, Tara. 2001. Corruption: Deconstructing the World Bank Discourse. LSE Development Studies Institute Working Paper 01-18.

Pomerantsev, Peter, Geoffrery Robertson, Jovan Ratkovic & Anne Applebaum. 2014. Revolutionary Tactics: Insights from Police and Justice Reform in Georgia (London: Legatum Institute).

Poon, Delia. 1996. exposure to the Foreign Corrupt Practices Act: A Guide for U.S. Companies with Activities in the People's Republic of China to Minimize Liability. Hastings International & Comparative Law Review

Pop, Ioana. 2012. Acceptance of Corrupt Acts: A Comparative Study of Values Regarding Corruption in Europe. Journal of Social Research & Policy

Popa, Mircea. 2014. Legislative Bargaining and Open Access: Economic Reform in 19th Century Britain. Working paper.

Pg 1725 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 Popa, Mircea. 2014. The Distributive Effects of Corruption. Political Science Research &  
2 Methods (forthcoming).

3 Popa, Mircea. 2015. Elites and Corruption. World Politics

4 Pope, Jeremy & Frank Vogl. 2000. Making Anticorruption Agencies More Effective.  
5 Finance & Development.

6 Pope, Jeremy. 2000. Confronting Corruption: The Elements of a National Integrity System.  
7 Transparency International.

8 Popescu, Ada-Iuliana. 2015. Financing Democracy or Corruption? Political Party Financing  
9 in the EU's Southeastern and Eastern Member States. Working paper.

10 Popoola, O.M.J., A. Che-Ahmad & R.S. Samsudin. 2015. An Empirical Investigation of  
11 Fraud Risk Assessment and Knowledge Requirement on Fraud Related Problem Representation in  
12 Nigeria. Accounting Research Journal

13 Popov, S.V. 2015. Decentralized Bribery and Market Participation. Scandinavian Journal of  
14 Economics

15 Popova, M. 2012. Why doesn't the Bulgarian Judiciary Prosecute Corruption? Problems of  
16 Post-Communism

17 Poprawe, M. 2015. A Panel Data Analysis of the Effect of Corruption on Tourism. Applied  
18 Economics

19 Poprawe, M. 2015. On the Relationship Between Corruption and Migration: Empirical  
20 Evidence from a Gravity Model of Migration. Public Choice

21 Porter, L.E. & C. Warrender. 2009. A Multivariate Model of Police Deviance: Examining  
22 The Nature of Corruption, Crime and Misconduct. Policing & Society

23 Porter, Robert H. & J. Douglas Zona. 1993. Detection of Bid Rigging in Procurement  
24 Auctions. Journal of Political Economy

25 Porto, Mauro. 2011. "The Media and Political Accountability", in Timothy Power &  
26 Matthew Taylor eds., Corruption and Democracy in Brazil: The Struggle for Accountability  
27 (Indiana: University of Notre Dame Press)

28 Posadas, Alejandro. 2000. Combating Corruption Under International Law. Duke Journal of  
Comparative & International law 10.

Pottenger, M. 2014. Incentives and Norms in Anticorruption Reform. Australian Journal of  
Public Administration

Potter, Joshua & Margit Tavits. 2012. "Curbing Corruption with Political Institutions", in  
Susan Rose-Ackerman & Tina Soreide eds., International Handbook on the Economics of  
Corruption, Vol. II. (Edward Elgar Publishing).



- 1 Potts, T. 2014. Governance, Corruption and Olympic Success. Applied Economics
- 2 Power, Timothy J. & Matthew M. Taylor. 2011. Corruption and Democracy in Brazil: The
- 3 Struggle for Accountability. University of Notre Dame Press) Powpaka, Samart. 2002. Factors
- 4 Affecting Managers' Decision to Bribe: An Empirical Investigation. Journal of Business Ethics.
- 5 Pozsgai Alvarez, Joseph. 2015. Low-Level Corruption Tolerance: An "Action-Based"
- 6 Approach for Peru and Latin America. Journal of Politics in Latin America
- 7 Pradhan, Sanjay & Jose Edgardo Campos, eds. 2007. The Many Faces of Corruption:
- 8 Tracking Vulnerabilities at the Sector Level. Washington, D.C.: The World Bank.
- 9 Prado, Mariana Moto & Lindsey D. Carson. 2014. Brazilian Anti-Corruption Legislation
- 10 and its Enforcement: Potential Lessons for Institutional Design. IRIBA Working Paper #9.
- 11 Prasad, Ambika & Sridevi Shivarajan. 2015. Understanding the Role of Technology in
- 12 Reducing Corruption: A Transaction Cost Approach. Journal of Public Affairs 15(1): 19-36.
- 13 Prendergast, Canice. 2000. Investigating Corruption (World Bank Development Research
- 14 Group, Policy Research Working Paper 2500)
- 15 Prendergast, Shannon, Judith A. Clarke & G. Cornelis Van Kooten. 2011. Corruption,
- 16 Development and the Curse of Natural Resources. Canadian Journal of Political Science
- 17 Prenzler, T., A. Beckley & S. Bronitt. 2013. Police Gifts and Benefits Scandals: Addressing
- 18 Deficits in Policy, Leadership and Enforcement. International Journal of Police Science &
- 19 Management
- 20 Price, Michael. 2006. "Case Study: Integrity Due Diligence", in B. Errath ed., Business
- 21 Against Corruption: Case Stories and Examples (New York: United Nations Global Compact
- 22 Office)
- 23 Price, Pamela G. 1999. Cosmologies and Corruption in (South) India: Thinking Aloud.
- 24 Forum for Development Studies
- 25 Priess, Hans-Joachim. 2013. Questionable Assumptions: The Case for Updating the
- 26 Suspension and Debarment Regimes at the Multilateral Development Banks. George Washington
- 27 International Law Review
- 28 Priks, Michael. 2011. Judiciaries in Corrupt Societies. Economics of Governance
- Priks, Michael. 2012. Competition Among Officials and the Abuse of Power. Public Choice
- Proskuryakova, Liliana, Gulnara Abdrakhmanova & Hans Pitlik. 2013. Public Sector E-
- Innovations: E-Government and Its Impact on Corruption. Working paper.
- Prud'homme, Remy. 1995. The Dangers of Decentralization. World Bank Research Observe



Puckett, Blake. 2008. The Foreign Corrupt Practices Act, OPIC, and the Retreat from Transparency. *Indiana Journal of Global Legal Studies* 15: 149-176.

Puckett, Blake. 2010. Clans and the Foreign Corrupt Practices Act: Individualized Corruption Prosecution in Situations of Systemic Corruption. *Georgetown Journal of International Law*

Puglisi, Riccardo & James M. Snyder, Jr. 2008. Media Coverage of Political Scandals.

Punch, Maurice. 2000. Police Corruption and Its Prevention. *European Journal on Criminal Policy & Research*

Pyman, M. J. Cohen, M. Boardman, B. Webster, N. Seymour. 2012. Arresting Corruption in the Police: The Global experience of Police Corruption Reform Efforts. (London: Transparency International UK).

Qerimi, Q. & B.S. Sergei. 2012. The Effects of Economic Freedom on Institutional Performance in the Western Balkans Countries. *International Journal of Business Governance & Ethics*

Qian, X. & J. Sandoval-Hernandez. 2015. Corruption Distance and Foreign Direct Investment. *Emerging Markets Finance & Trade*.

Qizilbash, M. 2001. Corruption and Human Development: A Conceptual Discussion. *Oxford Development Studies*

Quah, Jon S.T. 1995. Controlling Corruption in City-States: A Comparative Study of Hong Kong and Singapore. *Crime, Law & Social Change*

Quah, Jon S.T. 1999. Comparing Anti-Corruption Measures in Asian Countries: Lessons to be Learnt. *Asian Review of Public Administration* 11: 71-.

Quah, Jon S.T. 2004. Democratization and Political Corruption in the Philippines and South Korea: A Comparative Analysis. *Crime, Law & Social Change*

Quah, Jon S.T. 2009. "Curbing Corruption in a One-Party Dominant System: Learning from Singapore's experience", in Gong, T. & S.K. Ma eds., *Preventing Corruption in Asia: Institutional Design and Policy Capacity* (London: Routledge).

Quah, Jon S.T. 2009. Benchmarking for Excellence: A Comparative Study of Seven Asian Anti-Corruption Agencies. *Asia Pacific Journal of Public Administration*

Quah, Jon S.T. 2009. Combating Corruption in the Asia-Pacific Countries: What Do We Know and What Needs to be Done? *International Public Management Review*

Quah, Jon S.T. 2010. Curbing Corruption in the Philippines: Is this an Impossible Dream? *Philippine Journal of Public Administration*

1 Quah, Jon S.T. 2010. Defying Institutional Failure: Learning from the experiences of Anti-  
2 Corruption Agencies in Four Asian Countries. Crime, Law & Social Change

3 Quah, Jon S.T. 2010. Trust and Governance in the Philippines and Singapore: A  
4 Comparative Analysis. International Public Management Review

5 Quah, Jon S.T. 2013. Minimizing Corruption in China: Is This an Impossible Dream?  
6 Maryland Series in Contemporary Asian Studies, No. 4.

7 Quah, Jon S.T. 2015. Evaluating the Effectiveness of Anti-Corruption Agencies in Five  
8 Asian Countries. Asian Education & Development Studies

9 Quah, Jon S.T. 2015. Singapore's Corrupt Practices Investigation Bureau. Asian Education  
10 & Development Studies

11 Quah, Jon. 2003. Curbing Corruption in Asia: A Comparative Study of Six Countries.  
12 Singapore: Eastern Universities Press.

13 Querubin, Pablo & James M. Snyder, Jr. 2013. The Control of Politicians in Normal Times  
14 and Times of Crisis: Wealth Accumulation by U.S. Congressmen, 1850-1880. Quarterly Journal of  
15 Political Science.

16 Rabl, T. & T.M. Kuhlman. 2009. Why or Why Not? Rationalizing Corruption in  
17 Organizations. Cross Cultural Management

18 Rabl, T. 2015. When Allegedly Corrupt Organizations Are Attractive. Journal of Managerial  
19 Psychology

20 Radu, I., M. Sabau, C. Sendroiu & S. Pete. 2015. Coercive Economic Diplomacy –  
21 Corruption Trigger or Deterrent. Economic Computation & Economic Cybernetics Studies &  
22 Research

23 Raeschke-Kessler, Hilmar & Dorothee Gottwald. 2008. Corruption in Foreign Investment—  
24 Contracts and Dispute Settlement between Investors, States and Agents. Journal of World  
25 Investment & Trade

26 Rahman, Aminur, Gregory Kisunko & Kapil Kapoor. 2014. Estimating the Effects of  
27 Corruption: Implications for Bangladesh. Working paper.

28 Rajagopal, Balakrishnan. 1999. Corruption, Legitimacy and Human Rights: The Dialectic of  
the Relationship. Connecticut Journal of International Law

Rajan, R. & A. Subramanian. 2007. does Aid Affect Governance? American Economic  
Review

Rajkumar, A.S. & V. Swaroop. 2008. Public Spending and Outcomes: does Governance  
Matter? Journal of Development Economics

Pg 1729 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Ralchev, Plamen. 2004. The Role of Civil Society in Fighting Corruption and Organized  
2 Crime in Southeast Europe. Journal of Southeast Europe & Black Sea Studies
- 3 Ramalho, Rita. 2007. The Persistence of Corruption: Evidence from the 1992 Presidential  
4 Impeachment in Brazil. (World Bank working paper).
- 5 Ramasastry, Anita. 2007. Odious Debt or Odious Payments? Using Anti-Corruption  
6 Measures to Prevent Odious Debt. North Carolina Journal of International Law & Commercial  
7 Regulation 32: 819-.
- 8 Ramirez, C.D. 2014. Is Corruption in China “Out of Control”? A Comparison with the US in  
9 Historical Perspective. Journal of Comparative Economics
- 10 Ramkumar, Vivek & Warren Krafchik. 2005. The Role of Civil Society Organiziations in  
11 Auditing and Public Financial Management. Working paper.
- 12 Ramkumar, Vivek. 2007. expanding Collaboration Between Public Audit Institutions and  
13 Civil Society. Working paper.
- 14 Ramkumar, Vivek. 2008. Our Money, Our Responsibility: A Citizens’ Guide to Monitoring  
15 Government expenditures. The Internatioanl Budget Project.
- 16 Rand, John & Finn Tarp. 2012. Firm-Level Corruption in Vietnam. Economic Development  
17 & Cultural Change
- 18 Randall, Lisa Harriman. 1997. Multilateralization of the Foreign Corrupt Practices Act.  
19 Minn. J. Global Trade
- 20 Randrianarisoa, L.M., D. Bolduc, Y.Y. Choo, T.H. Oum & J. Yan. 2015. Effects of  
21 Corruption on Efficiency of the European Airports. Transportation Research Part A: Policy &  
22 Practice
- 23 Raouf, Mohamed Abdel. 2009. How Should International Arbitration Tackle Corruption  
24 Issues? ICSID Review
- 25 Rashid, Salim. 1981. Public Utilities in Egalitarian LDC’s: The Role of Bribery in  
26 Achieving Pareto Efficiency. Kyklos: Int’l Rev. for Soc. Sci.
- 27 Rasmusen, Eric & J. Mark Ramseyer. 1992. Cheap Bribes and the Corruption Ban: A  
28 Coordination Game Among Rational Legislators. Public Choice
- Ratcliffe, R. 2014. The FCPA’s Legacy: A Case for Imposing Aiding-and-Abetting Liability  
on Corporations through an Amended Alien Tort Claims Act. Texas International Law Journal
- Rauch, James E. & Peter B. Evans. 2000. Bureaucratic Structure and Bureaucratic  
Performance in Less Developed Countries. Journal of Public Economics
- Rauch, James E. 1995. Bureaucracy, Infrastructure, and Economic Growth: Evidence from  
U.S. Cities. American Economic Review

1 Rauch, James E. 2001. Leadership Selection, Internal Promotion, and Bureaucratic  
2 Corruption in Less Developed Polities, Canadian J. Econ.

3 Rauh, J. 2015. Predicting Political Influence on State Ethics Commissions: Of Course We  
4 Are Ethical—Nudge Nudge, Wink Wink. Public Administration Review

5 Razafindrakoto, M. & F. Roubaud. 2007. Corruption, Institutional Discredit, and Exclusion  
6 of the Poor: A Poverty Trap. Afrobarometer Working Paper 86.

7 Razafindrakoto, Mireille & Francois Rouband. 2010. Are International Databases on  
8 Corruption Reliable? A Comparison of expert Opinion Surveys and Household Surveys in Sub-  
Saharan Africa. World Development

9 Razzano, Frank C. & Travis P. Nelson. 2008. The expanding Criminalization of  
10 Transnational Bribery: Global Prosecution Necessitates Global Compliance. International Law 42

11 Recanatini, Francesca, Alessandro Prati & Guido Tabellini. 2005. Why Are Some Public  
12 Agencies Less Corrupt than Others? Lessons for Institutional Reform from Survey Data.

13 Recanatini, Francesca. 2011. “Anti-Corruption Authorities: An Effective tool to Curb  
14 Corruption?”, in Susan Rose-Ackerman & Tina Soreide eds., International Handbook on the  
Economics of Corruption, Vol. II. (Edward Elgar Publishing).

15 Recanatini, Francesca. 2012. “Assessing Corruption at the Country Level”, in Adam  
Graycar & Russell G. Smith eds., Handbook of Global Research and Practice in Corruption ,

16 Recanatini, Francesca. 2013. “Tackling Corruption and Promoting Better Governance: The  
17 Road Ahead”, in Susan Rose-Ackerman & Paul D. Carrington eds., Anti-Corruption Policy: Can  
International Actors Play a Constructive Role? (Durham: Carolina Academic Press)

18 Redlawsk, David P. & James A. McCann. 2005. Popular Interpretations of “Corruption” and  
19 their Partisan Consequences. Political Behavior

20 Reed, Q. & A. Fontana. 2011. Corruption and Illicit Financial Flows: The Limits and  
21 Possibilities of Current Approaches. U4 Issue Paper 2011(2).

22 Reed, Steven A. 1999. “Punishing Corruption: The Response of the Japanese Electorate to  
23 Scandals”, in Ofer Feldman ed., Political Psychology in Japan: Behind the Nails which Sometimes  
Stick Out (and Get Hammered Down) (Commack, NY: Nova Science)

24 Reed, Steven. 1996. Political Corruption in Japan. International Social Science Journal 149.

25 Rehren, Alfredo. 1997. Corruption and Local Politics in Chile. Crime, Law & Social Change

26 Reinikka, Ritva & Jacob Svensson. 2004. Local Capture: Evidence from a Central  
27 Government Transfer Program in Uganda. Quarterly Journal of Economics

28 Reinikka, Ritva & Jakob Svensson. 2005. Fighting Corruption to Improve Schooling:

Pg 1731 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 Evidence from a Newspaper Campaign in Uganda. Journal of the European Economics Association

2 Reinikka, Ritva & Jakob Svensson. 2006. Using Micro-Surveys to Measure and explain  
Corruption. World Development

3 Reinikka, Ritva & Jakob Svensson. 2011. The Power of Information in Public Services:  
4 Evidence from Education in Uganda. Journal of Public Economics

5 Reisman, W. Michael. 1989. Harnessing International Law to Restrain and Recapture  
6 Indigenous Spoliations. American Journal of International Law

7 Relly, J.E. & D. Cuillier. 2010. A Comparison of Political, Cultural, and Economic  
8 Indicators of Access to Information in Arab and Non-Arab States. Government Information  
Quarterly

9 Relly, J.E. & M. Sabharwal. 2009. Perceptions of Transparency of Government  
10 Policymaking: A Cross-National Study. Government Information Quarterly

11 Relly, Jeannine E. 2011. "Corruption, Secrecy, and Access-to-Information Legislation in  
12 Africa: A Cross-National Study of Political Institutions", in S. Maret ed., Research in Social  
Problems and Public Policy (Bingley, UK: Emerald Group)

13 Relly, Jeannine E. 2012. Examining a Model of Vertical Accountability: A Cross-National  
14 Study of the Influence of Information Access on the Control of Corruption. Government  
Information Quarterly

15 Remmer, Karen. 2007. The Political Economy of Patronage: expenditure Patterns in the  
16 Argentine Provinces, 1983-2003. Journal of Politics

17 Renno, Lucio R. 2011. "Corruption and Voting", in Timothy Power & Matthew Taylor eds.,  
18 Corruption and Democracy in Brazil: The Struggle for Accountability (Indiana: University of Notre  
Dame Press)

19 Reno, William. 2008. Anti-Corruption Efforts in Liberia: Are They Aimed at the Right  
20 Targets? International Peacekeeping4.

21 Renoe, Curtis E. 2002. Institutionalized "Corruption": Implications for Legal Reform in  
22 Indonesia and the Need to Make Haste Slowly. Stanford Journal of East Asian Affairs

23 Reuben, E. & M. Stephenson. 2013. Nobody Likes a Rat: On the Willingness to Report Lies  
24 and the Consequences Thereof. Journal of Economic Behavior & Organization

25 Reyes, Vicente C. Jr. 2007. Corruption and Policy Implementation in the Philippines: A  
26 Comparative Analysis of the Teacher Training and Textbook Delivery Programmes. Asian Journal  
of Political Science

27 Reyes, Vicente C. Jr. 2009. Case Study of Implementation amidst Corruption Linkages: The  
28 National Textbook Delivery Programme (TDP) of the Philippine Department of Education. Journal  
of Educational Policy

- 1 Reyes, Vicente C. Jr. 2009. Systemic Corruption at the Programme on Basic Education in  
2 the Philippine Department of Education. *Journal of Developing Societies*
- 3 Reyes, Vicente C. Jr. 2010. The Philippine Department of Education: Challenges of Policy  
4 Implementation amidst Corruption. *Asia Pacific Journal of Education*
- 5 Riahi-Belkaoui, Ahmed. 2004. "Effects of Corruption on Earnings Opacity Internationally"  
6 in J. Timothy Sale ed., *Advances in International Accounting* (Elsevier).
- 7 Riahi-Belkaoui, Ahmed. 2008. "Bureaucracy, Corruption and Tax Compliance", in Robert  
8 McGee ed., *Taxation and Public Finance in Transitional and Developing Economies* (Springer  
9 Science).
- 10 Ribadu, Nuhu. 2011. *Show Me the Money: Leveraging Anti-Money Laundering Tools to*  
11 *Fight Corruption in Nigeria.* (Washington, DC: Center for Global Development).
- 12 Richard, S.B. 2014. To Bribe a Prince: Clarifying the Foreign Corrupt Practices Act through  
13 Comparisons to the United Kingdom's Bribery Act of 2010. *Boston College International &*  
14 *Comparative Law Review* 37(2): 419-450.
- 15 Richardson, D. & A. Tepikina. 2015. Anti-Corruption Campaign in China—The Privileged  
16 Class. *Banking Law Journal* .
- 17 Richardson, G. 2006. Taxation Determinants of Fiscal Corruption: Evidence across  
18 Countries. *Journal of Financial Crime*
- 19 Richey, Sean. 2010. The Impact of Corruption on Social Trust. *American Politics Research*
- 20 Richter, D. & P. Uhmeister. 2013. Returning "Politically exposed Persons" Illicit Assets  
21 from Switzerland – International Law in the Force Field of Complexity and Conditionality. *German*  
22 *Yearbook of International Law*
- 23 Rider, B. 1995. The Wages of Sin – Taking the Profit Out of Corruption – A British  
24 Perspective. *Dickinson Journal of International Law*
- 25 Rider, B. 2007. Recovering the Proceeds of Corruption. *Journal of Money Laundering*  
26 *Control*
- 27 Ridley, F.F. 1995. Feet of Clay: Threat to the Temples of Democracy. *Parliamentary Aff.*
- 28 Rieder, Markus S. & Andreas Schoenemann. 2013. Suspicion of Corruption in Arbitration:  
A German Perspective. *Transnational Dispute Management* 10(3).
- Riera, Pedro, Pablo Barbera, Raul Gomez, Jose Antonio Mayoral & Jose Ramon Montero.  
2013. The Electoral Consequences of Corruption Scandals in Spain. *Crime, Law & Social Change*
- Rijkers, Bob, Caroline Freund & Antonio Nucifora. 2014. All in the Family: State Capture  
in Tunisia. World Bank Policy Research Working Paper 6810.

1 Riley, S. 2000. "Western Politics and African Realities: The New Anti-Corruption Agenda",  
2 in Hope, K. & B. Chikulo eds., *Corruption and Development in Africa: Lessons from Country Case  
3 Studies* (London: Macmillan).

4 Riley, S.P. 1999. *Petty Corruption and Development*. Development & Practice

5 Riley, Stephen P. 1993. *Post-Independence Anti-Corruption Strategies and the  
6 Contemporary Effects of Democratization*. Corruption & Reform 7:

7 Riley, Stephen P. 1998. *The Political Economy of Anti-Corruption Strategies in Africa*.

8 *European Journal of Development Research*

9 Rinaldi, Sergio, Gustav Feichtinger, & Franz Wirl. 1998. *Corruption Dynamics in  
10 Democratic Societies*. Complexity

11 Rinnert, D. 2015. *The Politics of Civil Service and Administrative Reforms in Development  
12 —explaining Within-Country Variation of Reform Outcomes in Georgia After the Rose Revolution*.  
Public Administration & Development

13 Rivas, M. Fernanda. 2013. *An experiment on Corruption and Gender*. Bulletin of Economic  
14 Research

15 Rivera-Batiz, Francisco L. 2001. *International Financial Liberalization, Corruption and  
16 Economic Growth*. Review of International Economics

17 Rivkin-Fish, Michele. 2005. "Bribes, Gifts and Unofficial Payments: Rethinking Corruption  
18 in Post-Soviet Health Care", in Dieter Haller & Chris Shore eds., *Corruption: Anthropological  
19 Perspectives* (Pluto Press).

20 Roath, P.T. 2014. *The Abuse of Incumbency on Trial: Limits on Legalizing Politics*.  
21 *Columbia Journal of Law & Social Problems* .

22 Robbins, Paul. 2000. *The Rotten Institution: Corruption in Natural Resource Management*.  
23 *Political Geography*.

24 Roberts, Andrew. 2008. *Hyperaccountability: Economic Voting in Central and Eastern  
25 Europe*. Electoral Studies.

26 Roberts, J. 2015. *The "Subject" of Corruption*. Critical Perspectives on Accounting.

27 Robertson, Christopher J. & Andrew Watson. 2004. *Corruption and Change: The Impact of  
28 Foreign Direct Investment*. Strategic Management Journal

Robertson-Snape, Fiona. 1999. *Corruption, Collusion and Nepotism in Indonesia*. Third  
World Quarterly

Robinson, James A. & Ragnar Torvik. 2005. *White Elephants*. Journal of Public Economics



1 Robinson, James A. & Thierry Verdier. 2013. The Political Economy of Clientalism.  
2 Scandinavian Journal of Economics

3 Robinson, James A., Ragnar Torvik & Thierry Verdier. 2006. Political Foundations of the  
4 Resource Curse. Journal of Development Economics 79:

5 Robinson, Mark. 1998. Corruption and Development: An Introduction. European Journal of  
6 Development Research

7 Robinson, Misty. 2012. Global Approach to Anti-Bribery and Corruption, An Overview:  
8 Much Done, But a Lot More to Do... Thurgood Marshall Law Review

9 Rocca, J. 1992. Corruption and Its Shadow: An Anthropological View of Corruption in  
10 China. China Quarterly.

11 Rock, Michael T. & Heidi Bonnett. 2004. The Comparative Politics of Corruption:  
12 Accounting for the East Asian Paradox in Empirical Studies of Corruption, Growth and Investment.  
13 World Development

14 Rock, Michael T. 2009. Corruption and Democracy. Journal of Development Studies

15 Rodino, Peter. 1994. The Case for the Independent Counsel. Seton Hall Legislation Journal  
16 19: 5-.

17 Rodrigues-Neto, J.A. 2014. On Corruption, Bribes and the Exchange of Favors. Economic  
18 Modelling

19 Rodriguez, Francisco & Jeffrey D. Sachs. 1999. Why Do Resource Abundant Countries  
20 Grow More Slowly? Journal of Economic Growth

21 Rodriguez, Peter, Donald S. Siegel, Amy Hillman & Lorraine Eden. 2006. Three Lenses on  
22 the Multinational Enterprise: Politics, Corruption, and Corporate Social Responsibility. Journal of  
23 International Business Studies

24 Rodriguez, Peter, Klaus Uhlenbruck & Lorraine Eden. 2005. Government Corruption and  
25 the Entry Strategies of Multinationals. Academy of Management Review

26 Rodriguez-Pose, Andres & Michael Storper. 2006. Better Rules or Stronger Communities?  
27 On the Social Foundations of Institutional Change and Its Economic Effects. Economic Geography

28 Roebuk, Julian B. & Thomas Barker. 1974. A Typology of Police Corruption. Social  
Problems

Rogers, Sarah B. 2008. The World Bank Voluntary Disclosure Program (VDP): A  
Distributive Justice Critique. Columbia Journal of Transnational Law

Rogowski, Ronald. 1987. Trade and the Variety of Democratic Institutions. International  
Organization



1 Rohde, C. 2014. A New Affirmative Defense to the FCPA for Countries Exiting Major  
2 Internal Strife. Richmond Journal of Global Law & Business

3 Rohde, Chris. 2014. A New Affirmative Defense to the FCPA for Countries Exiting Major  
4 Internal Strife. Richmond Journal of Global Law & Business

5 Rohlfsen, Ryan J. 2012. Recent Developments in Foreign and Domestic Criminal  
6 Commercial Bribery Laws. University of Chicago Legal Forum

7 Rohwer, Anja. 2009. Measuring Corruption: A Comparison between the Transparency  
8 International's Corruption Perceptions Index and the World Bank's Worldwide Governance  
9 Indicators. CESifo DICE Report

10 Roiseland, A., J. Pierre & A. Gustavsen. 2015. Accountability by Professionalism or  
11 Managerialism? exploring Attitudes Among Swedish and Norwegian Local Government Leaders.  
12 International Journal of Public Administration

13 Roldan, Antonio C. 1989. A Brief Psychology of Corruption. Psychology: A Journal of  
14 Human Behavior 5.

15 Roman, A. 2014. The Multi-Shade Paradox of Public Corruption: The Moldovan Case of  
16 Dirty Hands and Collective Action. Crime, Law & Social Change

17 Roman, A.V. & H.T. Miller. 2014. Building Social Cohesion: Family, Friends, and  
18 Corruption. Administration & Society

19 Roman, A.V. 2014. Refocusing Perspectives on Public Corruption Away from the  
20 Individual: Insights from the Moldovan Social Matrix. Transylvanian Review of Administrative  
21 Sciences

22 Romer, Paul. 1994. New Goods, Old Theory, and the Welfare Costs of Trade Restrictions.  
23 Journal of Development Economics

24 Roniger, Luis. 2004. Political Clientalism, Democracy, and Market Economy. Comparative  
25 Politics

26 Ronit, K. & I. McMenamin. 2015. If Money Talks, What does It Say? Corruption and  
27 Business Financing of Political Parties. West European Politics

28 Root, Hilton L. 1996. Small Countries, Big Lessons: Governance and the Rise of East Asia.  
(Hong Kong: Oxford University Press).

Root, Hilton. 1996. Corruption in China: Has it Become Systemic? Asian Survey

Roper, Steven D. 2002. The Influence of Romanian Campaign Finance Laws on Party  
System Development and Corruption. Party Politics

Rosa, D.D., N. Gooroochurn & H. Gorg. 2015. Corruption and Productivity: Firm-Level

Evidence. Jahrbucher Fur Nationalokonomie Und Statistik

Rosas, G. & L. Manzetti. 2015. Reassessing the Trade-Off Hypothesis: How Misery Drives the Corruption Effect on Presidential Approval. Electoral Studies

Rose, Cecily. 2011. The Application of Human Rights Law to Private Sector Complicity in Governmental Corruption. Leiden Journal of International Law

Rose, Cecily. 2012. The Corner House Case and the Incomplete Incorporation of the OECD Anti-Bribery Convention in the United Kingdom. Tulane Journal of International & Comparative Law

Rose, Cecily. 2014. "Corruption and Conflicts of Interests in the United Kingdom", in Jean-Bernard Auby, Emmanuel Breen & Thomas Perroud eds., Corruption and Conflicts of Interest: A Comparative Law Approach

Rose, Cecily. 2014. Questioning the Role of International Arbitration in the Fight Against Corruption. Journal of International Arbitration

Rose, J. & P.M. Heywood. 2013. Political Science Approaches to Integrity and Corruption. Human Affairs

Rose, Jonathan. 2015. "Corruption and the Problem of Perception" , in Paul M. Heywood ed., The Routledge Handbook of Political Corruption (New York: Routledge)

Rose, Paul. 2012. State Capitalism and the Foreign Corrupt Practices Act. Ohio State Law Journal

Rose, Richard & William Mishler. 2007. Bridging the Gap Between the Perception and experience of Corruption. (Working paper).

Rose, Richard & William Mishler. 2010. experience versus Perception of Corruption: Russia as a Test Case. Global Crime

Rose, Richard. 2013. The Other Face of Bureaucracy: Perception of Bribery Is Worse than the Practice. WZB Mitteilungen 140(June)

Rose-Ackerman, Susan & Benjamin Billa. 2009. Treaties and National Security. NYU Journal of International Law & Policy .

Rose-Ackerman, Susan & Rory Truex. 2013. "Corruption and Policy Reform", in Bjorn Lomborg ed., Global Problems, Smart Solutions: Costs and Benefits (Cambridge University Press).

Rose-Ackerman, Susan & Sinead Hunt. 2012. Transparency and Business Advantage: The Impact of International Anti-Corruption Policies on the United States National Interest. NYU Annual Survey of American Law

Rose-Ackerman, Susan, ed. 2006. International Handbook on the Economics of Corruption.

1 Rose-Ackerman, Susan. 1978. Corruption: A Study in Political Economy. New York:  
Academic Press.

2 Rose-Ackerman, Susan. 1996. Democracy and 'Grand' Corruption. International Social  
3 Science Journal

4 Rose-Ackerman, Susan. 1997. The Role of the World Bank in Controlling Corruption. Law  
5 & Policy in International Business.

6 Rose-Ackerman, Susan. 1999a. Corruption and Government: Causes, Consequences, and  
7 Reform. New York: Cambridge University Press.

8 Rose-Ackerman, Susan. 1999b. Political Corruption and Democracy. Connecticut Journal of  
International Law 14

9 Rose-Ackerman, Susan. 2001a. "Political Corruption and Democratic Structures," in Arvind  
10 K. Jain, ed. The Political Economy of Corruption (New York: Routledge)

11 Rose-Ackerman, Susan. 2001b. Trust, Honesty, and Corruption: Reflection of the State-  
12 Building Process. European Journal of Sociology.

13 Rose-Ackerman, Susan. 2002a. "Grand" Corruption and the Ethics of Global Business.  
Journal of Banking & Finance 26: 1889-.

14 Rose-Ackerman, Susan. 2002b. Corruption and the Criminal Law. Forum on Crime &  
15 Society

16 Rose-Ackerman, Susan. 2008. Corruption and Government. International Peacekeeping

17 Rose-Ackerman, Susan. 2010a. Corruption: Greed, Culture and the State. Yale Law Journal

18 Rose-Ackerman, Susan. 2010b. The Law and Economics of Bribery and Extortion. Annual  
19 Review of Law & Social Science

20 Rose-Ackerman, Susan. 2013. "Introduction: The Role of International Actors in Fighting  
21 Corruption", in Susan Rose-Ackerman & Paul D. Carrington eds., Anti-Corruption Policy: Can  
International Actors Play a Constructive Role? (Durham: Carolina Academic Press)

22 Rose-Ackerman, Susan. 2014. "Corruption and Conflicts of Interest", in Jean-Bernard Auby,  
23 Emmanuel Breen & Thomas Perroud eds., Corruption and Conflicts of Interest: A Comparative  
24 Law Approach

25 Rosenson, Beth Ann. 2009. The Effect of Political Reform Measures on Perceptions of  
Corruption. Election Law Journal

26 Roser, W. 1992. The Independent Commission Against Corruption: The New Star  
27 Chamber? Criminal Law Journal

28 Ross, Lauren Ann. 2012. Using Foreign Relations Law to Limit Extraterritorial Application

of the Foreign Corrupt Practices Act. Duke Law Journal

Ross, Michael L. 1999. The Political Economy of the Resource Curse. World Politics .

Ross, Michael L. 2015. What Have We Learned About the Resource Curse? Annual Review of Political Science

Ross, Michael. 2001. does Oil Hinder Democracy? World Politics

Rossbacher, Henry H. & Tracy W. Young. 1997. The Foreign Corrupt Practices Act Within the American Response to Domestic Concerns. Dickinson Journal of International Law.

Rosser, Andrew. 2006. The Political Economy of the Resource Curse: A Literature Survey. IDS Working Paper 268.

Rothrock, Jay. 2008. Striking a Balance: The Speech or Debate Clause’s Testimonial Privilege and Policing Government Corruption, 24 Touro L. Rev.

Rothstein, Bo & Daniel Eek. 2009. Political Corruption and Social Trust: An experimental Approach. Rationality & Society

Rothstein, Bo & Davide Torsello. 2014. Bribery in Preindustrial Cultures: Understanding the Universalism-Particularism Puzzle. Journal of Anthropological Research

Rothstein, Bo & Eric M. Uslaner. 2005. All for All: Equality, Corruption, and Social Trust. World Politics .

Rothstein, Bo & Jan Teorell. 2008. What Is Quality of Government: A Theory of Impartial Political Institutions. Governance: An International Journal of Policy & Administration

Rothstein, Bo & Jan Teorell. 2015. “Causes of Corruption” , in Paul M. Heywood ed., The Routledge Handbook of Political Corruption (New York: Routledge)

Rothstein, Bo & Jan Teorell. 2015. Getting to Swededn, Part II: Breaking with Corruption in the Nineteenth Century. Scandinavian Political Studies

Rothstein, Bo, Marcus Samanni & Jan Teorell. 2012. explaining the Welfare State: Power Resources vs. The Quality of Government. European Political Science Review

Rothstein, Bo. 2011. Anti-Corruption: The Indirect “Big Bang” Approach. Review of International Political Economy

Rothstein, Bo. 2011. Corruption, Social Trust, and Inequality in International Perspective. Chicago: University of Chicago Press.

Rothstein, Bo. 2011. The Quality of Government: Corruption, Social Trust, and Inequality in International Perspective. University of Chicago Press.

Rothstein, Bo. 2013. Corruption and Social Trust: Why the Fish Rots from the Head Down.

1 Social Research 80(4): 1009-1032.

2 Rothstein, Bo. 2014. What Is the Opposite of Corruption? Third World Quarterly.

3 Rowe, M. 2009. Notes on a Scandal: The Official Enquiry Into Deviance and Corruption in  
4 New Zealand Police. Australian & New Zealand Journal of Criminology

5 Rubin, Nora M. 1998. A Convergence of 1996 and 1997 Global Efforts to Curb Corruption  
6 and Bribery in International Business Transactions: The Legal Implications of the OECD  
7 Recommendations and Convention for the United States, Germany, and Switzerland. American  
8 University International Law Review

9 Rudi, L.M., H. Azadi, F. Witlox & P. Lebailly. 2014. Land Rights as an Engine of Growth?  
10 An Analysis of Cambodian Land Grabs in the Context of Development Theory. Land Use Policy

11 Rueda, Miguel R. 2015. Buying Votes with Imperfect Local Knowledge and a Secret Ballot.  
12 Journal of Theoretical Politics

13 Ruengdet, K. & W. Wongsurawat. 2015. The Mechanisms of Corruption in Agricultural  
14 Price Intervention Projects: Case Studies from Thailand. Social Science Journal

15 Runde, Daniel F. & Sadika Hameed with Jeremiah Magpile. 2014. The Costs of Corruption:  
16 Strategies for Ending a Tax on Private-Sector-Led Growth. (Washington, D.C.: Center for Strategic  
17 & International Studies).

18 Runnels, Michael B. & Adam M. Burton. 2012. The Foreign Corrupt Practices Act and New  
19 Governance: Incentivizing Ethical Foreign Direct Investment in China and Other Emerging  
20 Economies. Cardozo Law Review

21 Rus, H. 2014. Corruption, Conflict and the Management of Natural Resources. Economics  
22 of Governance

23 Ruske, R. 2015. does Economics Make Politicians Corrupt? Empirical Evidence from the  
24 United States Congress.

25 Ruud, A.E. 2000. Corruption as Everyday Practice: The Public-Private Divide in Local  
26 Indian Society. Forum for Development Studies

27 Ruziev, K. & P. Midmore. 2015. Connectedness and SME Financing in Post-Communist  
28 Economies: Evidence from Uzbekistan. Journal of Development Studies

Ryan, Ann Marie et al. 1997. Workplace Integrity: Differences in Perceptions of Behaviors  
and Situational Factors. Journal of Business and Psychology

Ryvkin, Dmitry & Danila Serra. 2012. How Corruptible Are You? Bribery under  
Uncertainty. Journal of Economic Behavior & Organization

Ryvkin, Dmitry & Danila Serra. 2013. does Competition Among Public Officials Reduce  
Corruption? An experiment. Departmental Working Papers 1301, Southern Methodist University,

Department of Economics.

Ryznar, Margaret & Samer Korkor. 2011. Anti-Bribery Legislation in the United States and United Kingdom: A Comparative Analysis of Scope and Sentencing. *Missouri Law Review*

Saastomoinen, Antti & Timo Kuosmanen. 2014. Is Corruption Grease, Grit or a Gamble? Corruption Increases Variance of Productivity Across Countries. *Applied Economics*

Saba, Roberto Pablo & Luigi Manzetti. 1997. Privatization in Argentina: The Implications for Corruption. *Crime, Law & Social Change*

Sabato, Larry J. & Glenn R. Simpson. 1996. Dirty Little Secrets: The Persistence of Corruption in American Politics.

Sabet, D.M. & A. Tazreen. 2015. Governing Growth: Understanding Problems in Real Estate Development in Dhaka, Bangladesh. *Journal of South Asian Development*

Sabet, D.M. 2012. Corruption or Insecurity? Understanding Dissatisfaction with Mexico's Police. *Latin American Politics & Society*

Sabic-El-Rayess, Amra. 2014. Acting and Reacting: Youth's Behavior in Corrupt Educational Settings. *Peabody Journal of Education*

Sachs, Jeffrey D. & Andrew M. Warner. 2001. The Curse of Natural Resources. *European Economic Review*

Sadanandan, Anoop. 2012. Patronage and Decentralization: The Politics of Poverty in India. *Comparative Politics*

Sadigov, T. 2014. Corruption and Social Responsibility: Bribe Offers Among Small Entrepreneurs in Azerbaijan. *East European Politics*

Sadowsky, Justin M. 2005. The Transparency Myth: A Conceptual Approach to Corruption and the Impact of Mandatory Disclosure Laws, 4 *Conn. Pub. Int.*

Safavian, M.S., H.G. Douglas & C. Gonzalez-Vega. 2001. Corruption and Microenterprises in Russia. *World Development*

Sah, Raaj K. 1991. Social Osmosis and Patterns of Crime. *Journal of Political Economy*

Sah, Raaj. 2007. Corruption Across Countries and Regions: Some Consequences of Local Osmosis. *Journal of Economic Dynamics and Control*

Sah, S. & G. Loewenstein. 2010. Effect of Reminders of Personal Sacrifice and Suggested Rationalizations on Residents' Self-Reported Willingness to Accept Gifts: A Randomized Trial. *Journal of the American Medical Association*

Saha, B. & T. Thampy. 2006. Extractive Bribe and Default in Subsidized Credit Programs. *Journal of Economic Behavior & Organization*

- 1 Saha, Bibhas & Trivikraman Thampy. 2008. Corruption, Default and Optimal Credit in  
2 Welfare Programs. Working paper.
- 3 Saha, Bibhas. 2001. Red Tape, Incentive Bribe and the Provision of Subsidy. Journal of  
4 Development Economics
- 5 Saha, Bibhas. 2003. Harassment, Corruption and Tax Policy: A Comment on Marjit,  
6 Mukherjee and Mukherjee [Eur. J. Political Economy 16 (2000) 75-94], European Journal of  
7 Political Economy 1
- 8 Saha, S. & G. Yap. 2015. Corruption and Tourism: An Empirical Investigation in a Non-  
9 Linear Framework. International Journal of Tourism Research
- 10 Saha, S., R. Gounder, N. Campbell & J. Su. 2014. Democracy and Corruption: A Complex  
11 Relationship. Crime, Law & Social Change
- 12 Saha, S., R. Gounder & J.J. Su. 2009. The Interaction Effect of Economic Freedom and  
13 Democracy on Corruption: A Panel Cross-Country Analysis. Economics Letters
- 14 Saha, Shrabani & Jen-Je Su. 2012. Investigating the Interaction Effect of Democracy and  
15 Economic Freedom on Corruption: A Cross-Country Quantile Regression Analysis. Economic  
16 Analysis & Policy
- 17 Saisana, Michaela & Andrea Saltelli. 2012. Corruption Perceptions Index 2012 Statistical  
18 Assessment. JRC Scientific & Policy Reports, European Commission.
- 19 Sajo, Andras. 1998. Corruption, Clientalism and the Future of the Constitutional State in  
20 Eastern Europe. East Europe Constitutional Review 7
- 21 Sala-i-Martin, Xavier & Arvind Subramanian. 2013. Addressing the Natural Resource  
22 Curse: An Illustration from Nigeria. Journal of African Economics
- 23 Salbu, Steven R. 1994. True Codes Versus Voluntary Codes of Ethics in International  
24 Markets: Towards the Preservation of Colloquy in Emerging Global Communities.  
25 University of Pennsylvania Journal of International Business Law
- 26 Salbu, Steven R. 1997. Bribery in the Global Market: A Critical Analysis of the Foreign  
27 Corrupt Practices Act. Washington & Lee Law Review
- 28 Salbu, Steven R. 1999. Battling Global Corruption in the New Millennium. Law & Policy in  
International Business
- Salbu, Steven R. 1999. Extraterritorial Restriction of Bribery: A Premature Evocation of the  
Normative Global Village. Yale Journal of International Law
- Salbu, Steven R. 1999. The Foreign Corrupt Practices Act as a Threat to Global Harmony.  
Mich. J. Int'l L.



1 Salbu, Steven R. 2000. A Delicate Balance: Legislation, Institutional Change, and  
2 Transnational Bribery. Cornell International Law Journal

3 Salbu, Steven R. 2001. Information Technology in the War Against International Bribery  
4 and Corruption: The Next Frontier of Institutional Reform. Harvard Journal on Legislation

5 Saleh, S. 2014. Challenges in Combating Corruption and Fixing Accountability: In Iraq's  
6 Perspective. International Journal of Business & Social Science

7 Salinas-Jimenez, M.M. & J. Salinas-Jimenez. 2007. Corruption, Efficiency and Productivity  
8 in OECD Countries. Journal of Policy Modeling

9 Salmon, Timothy C. & Danila Serra. 2013. does Social Judgment Diminish Rule Breaking?  
(CSAE Working Paper WPS/2013-05.)

10 Salvatore, D. 2004. Growth and Poverty in a Globalizing World. Journal of Policy  
11 Modeling.

12 Salvatore, D. 2007. Growth, International Inequalities, and Poverty in a Globalized World.  
13 Journal of Policy Modeling

14 Salvatoriello, Paul. 2001. The Practical Necessity of Federal Intervention Versus the Ideal of  
15 Federalism: An expansive View of Section 666 in the Prosecution of State and Local Corruption.  
16 Georgetown Law Journal

17 Samimi, A. & H. Hosseinmardi. 2011. Gender and Corruption: Evidence from Selected  
18 Developing Countries. Middle-East Journal of Scientific Research

19 Sampford, Charles et al. eds. 2006. Measuring Corruption (Ashgate).

20 Sampson, S. 2007. Can the World Bank Do the Right Thing? When Anti-Corruption  
21 Movements Become Anti-Corruption Budget Lines. Working paper.

22 Sampson, S. 2010. "Diagnostics: Indicators and Transparency in the Anti-Corruption  
23 Industry", in S. Jansen, E. Schroeter & N. Stehr eds., Transparenz: Multidisziplinäre Durchsichten  
24 Durch Phänomene und Theorien des Undurchsichtigen. Wiesbaden: VS Verlag. Sampson, S. 2015.  
25 The Audit Juggernaut. Social Anthropology

26 Sampson, Steven. 1983. Bureaucracy and Corruption as Anthropological Problems: A Case  
27 Study from Romania. Folk,

28 Sampson, Steven. 2005. "Integrity Warriors: Global Morality and the Anticorruption  
Movement in the Balkans", in Dieter Haller & Chris Shore eds., Corruption: Anthropological  
Perspectives (Pluto Press).

Sampson, Steven. 2010. The Anti-Corruption Industry: From Movement to Institution.  
Global Crime

Samuel, Andrew & Aaron Lowen. 2010. Bribery and Inspection Technology. Economics of



Governance .

Samuel, Andrew. 2009. Preemptive Collusion Among Corruptible Law Enforcers. 71 Journal of Economic Behavior & Organization

Sanchez, Andrew. 2015. "Criminal Entrepreneurship: A Political Economy of Corruption and Organized Crime in India" , in Paul M. Heywood ed., The Routledge Handbook of Political Corruption (New York: Routledge)

Sandgren, Claes. 2005. Combating Corruption: The Misunderstood Role of Law. International Law

Sandholtz, Wayne & Mark M. Gray. 2003. International Integration and National Corruption, International Organization

Sandholtz, Wayne & Rein Taagepara. 2005. Corruption, Culture, and Communism. International Review of Sociology

Sandholtz, Wayne & William Koetzle. 2000. Accounting for Corruption: Economic Structure, Democracy, and Trade. International Studies Quarterly

Sandoval-Ballestreros, Irma. 2014. Rethinking Accountability and Transparency: Breaking the Public Sector Bias in Mexico. American University International Law Review

Sands, Barbara N. 1990. Decentralizing an Economy: The Role of Bureaucratic Corruption in China's Economic Reforms. Public Choice

Sandu, A.M. & M.L. Nitu. 2014. The Perception of Corruption in Public Administration. Contemporary Readings in Law & Social Justice

Santiso, C. 2006. Improving Fiscal Governance and Curbing Corruption: How Relevant Are Autonomous Audit Agencies? International Public Management Review

Sanyal, A. 2002. Audit Hierarchy in a Corrupt Tax Administration: A Note with Qualifications and Extensions. Journal of Comparative Economics 30: 317-324.

Sanyal, A., I.N. Gang & O. Goswami. 2000. Corruption, Tax Evasion and the Laffer Curve. Public Choice

Sanyal, R. & S. Samanta. 2002. Corruption Across Countries: The Cultural and Economic Factors. Business & Professional Ethics Journal

Sanyal, R. & S. Samanta. 2008. Effect of Perception of Corruption on Outward US Foreign Direct Investment. Global Business & Economics Review

Sanyal, R. & S. Samata. 2004. Correlates of Bribe Giving in International Business. International Journal of Commerce and Management

Sanyal, Rajib. 2005. Determinants of Bribery in International Business: The Cultural and

Economic Factors. Journal of Business Ethics

Sargiacomo, M., L. Ianni, A. D'Andreamatteo & S. Servalli. 2015. Accounting and the Fight Against Corruption in Italian Government Procurement: A Longitudinal Critical Analysis (1992-2014). Critical Perspectives on Accounting

Sarkar, Hiren & M. Aynul Hasan. 2001. Impact of Corruption on the Efficiency of Investment: Evidence from a Cross-Country Analysis. Asia-Pacific Development Journal

Sarlo, P. 2014. The Global Financial Crisis and the Transnational Anti-Corruption Regime: A Call for Regulation of the World Bank's Lending Practices. Georgetown Journal of International Law

Sarte, P.D. 2000. Informality and Rent-Seeking Bureaucracies in a Model of Long-Run Growth. Journal of Monetary Economics

Sarte, Pierre-Daniel G. 2001. Rent-Seeking Bureaucracies and Oversight in a Simple Growth Model. Journal of Economic Dynamics & Control

Sato, Hideki. 2011. Raising Wages as a Strategy to Reduce Corruption. Journal of Management & Strategy

Savage, James D. 1994. Corruption and Virtue at the Constitutional Convention. Journal of Politics .

Savona, Ernesto U. 1995. Beyond Criminal Law in Devising Anticorruption Policies: Lessons from the Italian experience. European Journal of Criminal Policy & Research

Sayed, Abdulhay. 2004. Corruption in International Trade and Commercial Arbitration.

Schaffer, Fred C. 2002. Might Cleaning Up Elections Keep People Away from the Polls? Historical and Comparative Perspectives. International Political Science Review

Schaffer, Frederic C. 2007. Elections for Sale: The Causes and Consequences of Vote Buying (Boulder, CO: Lynne Rienner Publishers).

Schaffer, Frederic Charles. 2005. Clean Elections and the Great Unwashed: Vote Buying and Voter Education in the Philippines. Working paper.

Schaffer, Frederic Charles. 2008. The Hidden Costs of Clean Election Reform. (Cornell University Press.)

Schatz, Florian. 2013. Fighting Corruption with Social Accountability: A Comparative Analysis of Social Accountability Mechanisms' Potential to Reduce Corruption in Public Administration. Public Administration & Development 33: 161-174.

Schefer, Krista Nadakavukaren. 2009. Corruption and the WTO Legal System. Journal of World Trade

Pg 1745 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Scheiner, E. 2005. Pipelines of Pork: Japanese Politics and a Model of Local Opposition  
2 Party Failure. *Comparative Political Studies*
- 3 Schelling, Thomas. 1973. Hockey Helmets, Concealed Weapons, and Daylight Saving: A  
4 Study of Binary Choices with Externalities. *Journal of Conflict Resolution*
- 5 Scheppele, Kim Lane. 1999. The Inevitable Corruption of Transition. *Connecticut Journal of  
6 International Law*
- 7 Scher, Daniel. 2005. Asset Recovery: Repatriating Africa's Looted Billions. *African  
8 Security Review*
- 9 Scherer, Matthias. 2002. Circumstantial Evidence in Corruption Cases before International  
10 Arbitration Tribunals. *International Arbitration Law Review*
- 11 Schikora, Jan Theodor. 2011. Bringing Good and Bad Whistle-Blowers to the Lab.
- 12 Schikora, Jan Theodor. 2013. How Do Groups Stabilize Corruption? *Journal of International  
13 Development*
- 14 Schleiter, Petra & Alisa M. Voznaya. 2014. Party System Competitiveness and Corruption.  
15 *Party Politics*
- 16 Schmidt, Diana. 2007. Anti-Corruption: What Do We Know? Research on Preventing  
17 Corruption in the Post-Communist World. *Political Studies Review*
- 18 Schmidt, Timothy W. 2009. Sweetening the Deal: Strengthening Transnational Bribery  
19 Laws Through Standard International Corporate Accounting Guidelines. *Minnesota Law Review*
- 20 Schneider, Bryan A. 1992. Do Not Go Gentle into That Good Night: The Unquiet Death of  
21 Political Patronage. *Wisconsin Law Review*
- 22 Schneider, Friedrich & Dominik H. Enste. 2000. Shadow Economies: Size, Causes, and  
23 Consequences. *Journal of Economic Literature*
- 24 Schopf, J.C. 2015. Deterring Extortive Corruption in Korea Through Democratization and  
25 the Rule of Law. *Journal of Comparative Asian Development* (forthcoming).
- 26 Schroth, P.W. & P. Sharma. 2003. Transnational Law and Technology as Potential Forces  
27 Against Corruption in Africa. *Management Decision*
- 28 Schroth, Peter W. 2002. The United States and the International Bribery Conventions.  
*American Journal of Comparative Law* 50(supp.)
- Schroth, Peter W. 2003. National and International Constitutional Law Aspects of African  
Treaties and Laws Against Corruption. *Transnational Law & Contemporary Problems*.
- Schroth, Peter W. 2004. International Constitutional Law and Anti-Corruption Measures in  
the European Union's Accession Negotiations: Romania in Comparative Perspective. *American*

Journal of Comparative Law

Schroth, Peter W. 2006. Corruption and Accountability of the Civil Service in the United States, *The American Journal of Comparative Law*.

Schueth, Sam. 2011. Assembling International Competitiveness: The Republic of Georgia, USAID, and the Doing Business Project. *Economic Geography*

Schultz, Jessica & Tina Soreide. 2008. Corruption in Emergency Procurement. *Disasters Journal*

Schulze, Guenther G., Bambang Suharnoko Sjarir & Nikita Zakharov. 2013. Corruption in Russia. Working paper.

Schulze, Gunther G. & Bjorn Frank. 2003. Deterrence versus Intrinsic Motivation: experimental Evidence on the Determinants of Corruptibility. *Economics of Governance*

Schumacher, Ingmar. 2013. Political Stability, Corruption and Trust in Politicians. *Economic Modelling*

Schuppan, T. 2009. E-Government in Developing Countries: experiences from Sub-Saharan Africa. *Government Information Quarterly*

Schuttauf, Nicholas. 2012. Repeal Anti-Bribery Legislation? A Defense of Laws Promoting Clean Business and Transparent Government. *New England Law Review*

Schutte, Sofie Arjon & Simon Butt. 2013. The Indonesian Court for Corruption Crimes: Circumventing Judicial Impropriety? U4 Brief. (September).

Schutte, Sofie Arjon. 2007. The Fight Against Corruption in Indonesia. *Journal of Current Southeast Asian Affairs*

Schutte, Sofie Arjon. 2011. Appointing Top Officials in a Democratic Indonesia: The Corruption Eradication Commission. *Bulletin of Indonesian Economic Studies*

Schutte, Sofie Arjon. 2012. Against the Odds: Anti-Corruption Reform in Indonesia. *Public Administration & Development*

Schwenke, S. 2000. The Moral Critique: Corruption in Developing Countries. *Journal of Public & International Affairs*

Scott, Ian. 2012. "The Hong Kong ICAC's Approach to Corruption Control", in Adam Graycar & Russell G. Smith eds., *Handbook of Global Research and Practice in Corruption* ,

Scott, James C. 1969. Corruption, Machine Politics, and Political Change. *American Political Science Review*

Scott, James C. 1969. The Analysis of Corruption in Developing Nations. *Comparative Studies in Society & History*

- 1 Scott, James C. 1972. Comparative Political Corruption (Englewood Cliffs, NJ: Prentice-  
2 Hall).
- 3 Scott, Kandis. 2005. The European Union and Romanian Mentalitate: A Case Study of  
4 Corruption. Santa Clara Journal of International Law
- 5 Seabright, Paul. 1996. Accountability and Decentralisation in Government: An Incomplete  
6 Contracts Model. European Economic Review
- 7 Segal, Lydia. 1997. Pitfalls of Political Decentralization and Proposals for Reform: The  
8 Case of New York City Public Schools. Public Administration Review
- 9 Segal, Lydia. 1998. Can We Fight the New Tammany Hall?: Difficulties of Prosecuting  
10 Political Patronage and Suggestions for Reform, Rutgers L. Rev.
- 11 Segal, Lydia. 1999. Corruption Moves to the Center: An Analysis of New York's 1996  
12 School Governance Law. Harvard Journal on Legislation
- 13 Segal, Lydia. 2002. Roadblocks in Reforming Corrupt Agencies: The Case of the New York  
14 City School Custodians, Public Administration Review
- 15 Segal, Lydia. 2004. Battling Corruption in America's Public Schools. Boston: Northeast  
16 University Press.
- 17 Segal, Lydia. 2010. Independence from Political Influence—A Shaky Shield: A Study of  
18 Ten Inspectors General. Public Integrity
- 19 Segal, Philip. 2006. Coming Clean on Dirty Dealing: Time for a Fact-Based Evaluation of  
20 the Foreign Corrupt Practices Act. Florida Journal of International Law
- 21 Sehhat, Saeed, Mehdi Jafarzadeh Kenari & Mohsen Mijani. 2012. An Empirical Study on  
22 Relationship Between Organizational Culture and Administrative Corruption. Management Science  
23 Letters
- 24 Seiler, Norbert & Jelena Madir. 2012. Fight Against Corruption: Sanctions Regimes of  
25 Multilateral Development Banks. Journal of International Economic Law
- 26 Seim, Line Tondel & Tina Soreide. 2009. Bureaucratic Complexity and Impacts of  
27 Corruption in Utilities. Utilities Policy
- 28 Sekalala, S. & M. Kirya. 2015. Challenges in Multi-Level Health Governance: Corruption in  
the Global Fund's Operations in Uganda and Zambia. Hague Journal on the Rule of Law
- Seker, M. & J.S. Yang. 2014. Bribery Solicitations and Firm Performance in the Latin  
American and Caribbean Region. Journal of Comparative Economics
- Seldadyo, Harry & Jakob De Haan. 2011. Is Corruption Really Persistent? Pacific Economic  
Review

1 Seldadyo, Harry, Emmanuel Pandu Nugroho & Jakob de Haan. 2007. Governance and  
2 Growth Revisited.

3 Seldadyo, Henry & Jakob de Haan. 2006. The Determinants of Corruption: A Literature  
4 Survey and New Evidence. (Paper prepared for the 2006 EPCS Conference, Turku, Finland, 20-23  
5 April).

6 Seligson, Mitchell A. 2001. Corruption and Democratization: What Is To Be Done? Public  
7 Integrity

8 Seligson, Mitchell A. 2002. On the Measurement of Corruption

9 Seligson, Mitchell A. 2002. The Impact of Corruption on Regime Legitimacy: A  
10 Comparative Study of Four Latin American Countries, Journal of Politics

11 Seligson, Mitchell A. 2006. The Measurement and Impact of Corruption Victimization:  
12 Survey Evidence from Latin America. World Development

13 Selmier, W. Travis II. 2013. Stand by Me: Friends, Relationship Banking and Financial  
14 Governance in Asia. Business Horizons.

15 Semukhina, Olga & K. M. Reynolds. 2014. Russian Citizens' Perceptions of Corruption and  
16 Trust of the Police. Policing & Society

17 Sengupta, M. 2014. Anna Hazare's Anti-Corruption Movement and the Limits of Mass  
18 Mobilization in India. Social Movement Studies

19 Sequeira, Sandra & Simeon Djankov. 2013. "Trade Costs and Corruption in Ports," in  
20 Cantens, Thomas, Robert Ireland & Gael Raballand eds., Reform by Numbers: Measurement  
21 Applied to Customs and Tax Administrations in Developing Countries. Washington, D.C.: World  
22 Bank.

23 Sequeira, Sandra & Simeon Djankov. 2014. Corruption and Firm Behavior: Evidence from  
24 African Ports. Journal of International Economics

25 Sequeira, Sandra. 2012. "Advances in Measuring Corruption", in Danila Serra & Leonard  
26 Wantchekon eds., New Advances in experimental Research on Corruption (Emerald Publishing).

27 Sequeira, Sandra. 2015. "Corruption and Trade Costs", in Susan Rose-Ackerman & Paul  
28 Lagunes eds., Greed, Corruption, and the Modern State

Sequeira, Sandra. 2015. Corruption, Trade Costs and Gains from Tariff Liberalization:  
Evidence from Southern Africa. Working paper.

Serafeim, George. 2013. Firm Competitiveness and Detection of Bribery. Working paper.

Serfontein, E. & E. de Waal. 2015. The Corruption Bogey in South Africa: Is Public  
Education Safe? South African Journal of Education

1 Serio, Mario. 2008. Politically exposed Persons: AML, Taking the Profit Out of Corruption  
2 and Problems for the Banks. Journal of Money Laundering Control

3 Serra, Danila & Leonard Wantchekon. 2012. New Advances in experimental Research on  
4 Corruption. (London: Emerald Books).

5 Serra, Danila. 2006. Empirical Determinants of Corruption: A Sensitivity Analysis. Public  
6 Choice

7 Serra, Danila. 2011. Combining Top-Down and Bottom-Up Accountability: Evidence from  
8 a Bribery experiment. Journal of Law, Economics & Organization

9 Serritzlew, S., K.M. Sonderskov & G.T. Svendsen. 2014. Do Corruption and Social Trust  
10 Affect Economic Growth? A Review. Journal of Comparative Policy Analysis: Research & Practice

11 Sevukten, M., M. Nargelecekenler & F. Guray. 2010. A Cross-Country Comparison of  
12 Corruption and Public expenditure: A Panel Data Approach. International Journal of Public  
13 Administration

14 Shabbir, Ghulam & Mumtaz Anwar. 2007. Determinants of Corruption in Developing  
15 Countries. Pakistan Development Review

16 Shafiq, M.N. 2015. Aspects of Moral Change in India, 1990-2006: Evidence from Public  
17 Attitudes toward Tax Evasion and Bribery. World Development

18 Shah, Anwar & M. Schacter. 2004. Combating Corruption: Look Before You Leap. Finance  
19 & Development

20 Shah, Anwar, Theresa Thompson & Heng-fu Zou. 2004. The Impact of Decentralization on  
21 Service Delivery, Corruption, Fiscal Management and Growth in Developing and Emerging Market  
22 Economies: A Synthesis of Empirical Evidence. CESifo Dice Report, A Quarterly Journal for  
23 Institutional Comparisons, 2(Spring)

24 Shah, Anwar. 2006. Corruption and Decentralized Public Governance. World Bank Policy  
25 Research Working Paper 3824.

26 Shah, Anwar. 2007. "Tailoring the Fight against Corruption to Country Circumstances", in  
27 Anwar Shah ed., Performance Accountability and Combating Corruption (Washington, D.C.: World  
28 Bank).

Shah, Anwar. 2014. Decentralized Provision of Public Infrastructure and Corruption.  
International Center for Public Policy Working Paper 14-18.

Shan, M., A. Chan, Y. Le, B. Xia & Y. Hu. 2015. Measuring Corruption in Public  
Construction Projects in China. Journal of Professional Issues in Engineering Education & Practice

Shan, M., A.P.C. Chan, Y. Le & Y. Hu. 2015. Investigating the Effectiveness of Response  
Strategies for Vulnerabilities to Corruption in the Chinese Public Construction Sector. Science &



Engineering Ethics

Shao, J., P.C. Ivanov, B. Podobnik & H.E. Stanley. 2007. Quantitative Relations Between Corruption and Economic Factors. European Physics Journal B

Shapiro, Joshua L. 2006. Corporate Media Power, Corruption, and the Media Exemption. Emory Law Journal.

Sharafutdinova, G. 2010. What explains Corruption Perceptions? The Dark Side of Political Competition in Russia's Regions. Comparative Politics

Sharma, Deepankar & Shrey Ashat. 2014. Corruption: Reasons & Remedy to Sustain Economic Development.

Sharman, J.C. & Jo-Anne Gilbert. 2015. Turning a Blind Eye to Bribery: explaining Failures to Comply with the International Anti-Corruption Regime. Political Studies

Sharman, J.C. 2010. Shopping for Anonymous Shell Companies: An Audit Study of Financial Anonymity and Crime. Journal of Economic Perspectives

Sharman, Jason C. & David Chaikin. 2009. Corruption and Anti-Money Laundering Systems: Putting a Luxury Good to Work. Governance

Sharman, Jason C. 2011. The Money Laundry: Regulating Criminal Finance in the Global Economy. Ithaca, NY: Cornell University Press.

Sharman, Jason C. 2012. Chasing Kleptocrats' Loot: Narrowing the Effectiveness Gap. U4 Issue 2012(4).

Sharman, Jason C., Emile van der does de Willebois, Emily Halter, Robert A. Harrison & Ji Won. 2011. The Puppet Masters: How the Corrupt Use Legal Structures to Hide their Stolen Assets and What to Do About it. . Washington, D.C.: World Bank.

Shaw, Bill. 2000. The Foreign Corrupt Practices Act and Progeny: Morally Unassailable. Cornell International Law Journal

Shaw, Philip, M. Katsaiti & B. Pecoraro. 2015. On the Determinants of Educational Corruption: The Case of Ukraine. Contemporary Economic Policy

Shaw, Philip, Marina-Selini Katsaiti & Marius Jurgilas. 2011. Corruption and Growth under Weak Identification. Economic Inquiry

Shaxson, Nicholas. 2007. Oil, Corruption, and the Resource Curse. International Affairs

Sheahen, Kyle P. 2010. I'm Not Going to Disneyland: Illusory Affirmative Defenses Under the Foreign Corrupt Practices Act. Wisconsin International Law Journal

Sheffet, Mary Jane. 1995. The Foreign Corrupt Practices Act and the Omnibus Trade and



Competitiveness Act of 1988: Did They Change Corporate Behavior? Journal of Public Policy & Marketing

Sheifer, Andrei. 2004. does Competition Destroy Ethical Behavior? American Economic Review

Shekshnia, Stanislav, Alena Ledeneva & Elena Denisova-Schmidt. 2014. Reflective Leadership v. Endemic Corruption in Emerging Markets. INSEAD Working Paper No. 2013/121/EFE.

Shelley, Louise I. & John T. Picarell. 2002. Methods, Not Motives: Implications of the Convergence of International Organized Crime and Terrorism. Police Practice & Research

Shelley, Louise. 2005. The Unholy Trinity: Transnational Crime, Corruption and Terrorism. Brown Journal of World Affairs

Shen, Ce & John B. Williamson. 2005. Corruption, Democracy, Economic Freedom and State Strength. A Cross-National Analysis. International Journal of Comparative Sociology

Shepherd, Ben. 2009. Speed Money: Time, Corruption, and Trade. MPRA Paper 17337.

Shepherd, Benjamin. 2009. More Speed, Less “Speed Money”: Asia-Pacific Firm-Level Evidence on Border Crossing Times as Corruption Incentives. Working paper.

Sherlock, Stephen. 2002. Combating Corruption in Indonesia? The Ombudsman and the Assets Auditing Commission. Bulletin of Indonesian Economic Studies

Sherman, Lawrence W. 1980. Three Models of Organizational Corruption in Agencies of Social Control. Social Problems.

Sheyn, Elizabeth. 2011. Criminalizing the Denial of Honest Services After Skilling . Wisconsin Law Review

Shi, Shouyong & Ted Temzelides. 2004. A Model of Bureaucracy and Corruption. International Economic Review

Shih, Victor, Christopher Adolph & Mingxing Liu. 2012. Getting Ahead in the Communist Party: explaining the Advancement of Central Committee Members in China. American Political Science Review

Shihata, Ibrahim. 1997. Corruption—A General Review with an Emphasis on the Role of the World Bank. Dickinson Journal of International Law

Shim, D.C. & T.H. Eom. 2008. E-Government and Anti-Corruption: Empirical Analysis of International Data. International Journal of Public Administration

Shim, D.C. & T.H. Eom. 2009. Anticorruption Effects of Information and Communication Technology (ICT) and Social Capital. International Review of Administrative Sciences

- 1 Shin, J.H. 2015. Voter Demands for Patronage: Evidence from Indonesia. *Journal of East Asian Studies*
- 2 Shirazi, Moiz A. 2012. The Impact of Corruption on International Trade. *Denver Journal of*
- 3 *International Law & Policy*
- 4 Shirin, S.S. 2015. Corruption in Higher Education in Russia—First Decade of the 21st
- 5 *Century. International Education Studies*
- 6 Shleifer, Andrei & Robert Vishny. 1994. Politicians and Firms. *Quarterly Journal of*
- 7 *Economics*
- 8 Shleifer, Andrei & Robert W. Vishny. 1993. Corruption. *Quarterly Journal of Economics*
- 9 Shola, Omatola. 2006. Through a Glass Darkly: Assessing the “New” War against
- 10 *Corruption in Nigeria. African Insign*
- 11 Sholderer, Olga. 2013. The Drivers of Police Reform: The Cases of Georgia and Armenia. *CEU Political Science Journal*
- 12 Shore, Cris & Dieter Haller. 2005. “Sharp Practice: Anthropology and the Study of
- 13 *Corruption,” in Dieter Haller & Chris Shore eds., Corruption: Anthropological Perspectives (Pluto Press)*
- 14 Shore, Cris. 2005. “Culture and Corruption in the EU: Reflections on Fraud, Nepotism and
- 15 *Cronyism in the European Commission”, in Dieter Haller & Chris Shore eds., Corruption: Anthropological Perspectives (Pluto Press).*
- 16 Shrewsbury, Diane A. 2012. Degrees of Corruption: The Current State of “Corrupt
- 17 *Persuasion” in 18 USC § 1512. University of Chicago Legal Forum*
- 18 Shu, Lisa L. & Francesca Gino. 2012. Sweeping Dishonesty Under the Rug: How Unethical
- 19 *Actions Lead to Forgetting of Moral Rules. Journal of Personality & Social Psychology*
- 20 Shu, Lisa L., Francesca Gino & M.H. Bazerman. 2011. Dishonest Deed, Clear Conscience:
- 21 *When Cheating Leads to Moral Disengagement and Motivated Forgetting. Personality & Social Psychology Bulletin*
- 22 Shulman, S. 2014. The Criminalization of Bribery: Can the Foreign Corrupt Practices Act
- 23 *Be Applicable to the Anti-Bribery Provisions of the United Nations Convention Against Corruption? American University International Law Review*
- 24 Siddiquee, N.A. 2010. Combating Corruption and Managing Integrity in Malaysia: A
- 25 *Critical Overview of Recent Strategies and Initiatives. Public Organization Review*
- 26 Silva, Emilson C.D., Charles M. Khan & Xie Zhu. 2007. Crime and Punishment and
- 27 *Corruption: Who Needs “Untouchables”? Journal of Public Economic Theor*
- 28 Silverman, Eli B. 1998. The Price of Controlling Corruption. *Public Administration Review.*

1           Simpser, Alberto. 2008. Cheating Big: On the Logic of Electoral Corruption in Developing  
2 Countries.

3           Simpser, Alberto. 2012. does Electoral Manipulation Discourage Voter Turnout? Evidence  
4 from Mexico. Journal of Politics

5           Simpser, Alberto. 2013. The Intergenerational Persistence of Attitudes Toward Corruption.  
6 Working paper.

7           Simpson, D. 2014. The Art of the Watchdog: Fighting Fraud, Waste, Abuse, and Corruption  
8 in Government. Political Science Quarterly

9           Simpson, Matthew. 2014. Terrorism and Corruption: Alternatives for Goal Attainment  
10 within Political Opportunity Structures. International Journal of Sociology

11           Singer, Sam. 2009. The Foreign Corrupt Practices Act in the Private Equity Era: Extracting  
12 a Hidden Element. Emory International Law Review

13           Singh, D. 2015. explaining Varieties of Corruption in the Afghan Justice Sector. Journal of  
14 Intervention & Statebuilding

15           Singh, G., R. Pathak, R. Naz & R. Belwal. 2010. E-Governance for Improved Public Sector  
16 Service Delivery in India, Ethiopia and Fiji. International Journal of Public Sector Management

17           Singh, Gurharpal. 1997. Understanding Political Corruption in Contemporary Indian  
18 Politics. Political Studies.

19           Sinlapapiromsuk, Tidarat. 2013. The Legal Consequences of Investor Corruption in  
20 Investor-State Disputes: How Should the System Proceed? Transnational Dispute Management

21           Sivachenko, Irina. 2013. Corporate Victims of “Victimless Crime”: How the FCPA’s  
22 Statutory Ambiguity, Coupled with Strict Liability, Hurts Businesses and Discourages Compliance.  
23 Boston College Law Review

24           Siverson, Randolph M. & Richard A.I. Johnson. 2014. Politics and Parasites: The  
25 Contribution of Corruption to Human Misery. International Studies Quarterly

26           Sjajar, Bambang Suharnoko, Krisztina Kis-Katos & Guenther G. Schulze. 2014.

27           Administrative Overspending in Indonesian Districts: The Role of Local Politics. World  
28 Developmen

          Sjoberg, Fredrik M. 2014. Autocratic Adaptation: The Strategic Use of Transparency and  
the Persistence of Election Fraud. Electoral Studies

          Skidmore, Max J. 1996. Promise and Peril in Combating Corruption: Hong Kong’s ICAC.  
Annals of the American Academy of Political and Social Science

1 Skladany, Martin. 2009. Buying Our Way Out of Corruption: Performance-Based Incentive  
2 Bonuses for Developing Country Politicians and Bureaucrats. Yale Human Rights & Development  
Law Journal

3 Skoblikov, Petr A. 2006. How Is Corruption Punished in Present Day Russia? A  
4 Comparative Legal Analysis of Criminal Legislation and Judiciary Practice. European Journal of  
Crime, Criminal Law & Criminal Justice

5 Slomczynski, Kazimierz M. & Goldie Shabad. 2012. Perceptions of Political Party  
6 Corruption and Voting Behavior in Poland. Party Politics

7 Smaltz, Donald C. 1998. The Independent Counsel: A View from Inside. Georgetown Law  
8 Journal

9 Smart, A. & C.L. Hsu. 2007. "Corruption or Social Capital? Tact and the Performance of  
10 Guanxi in Market Socialist China", in M. Juijten & G. Anders eds., Corruption and the Secret of  
Law: A Legal Anthropological Perspective. (Burlington, VT: Ashgate)

11 Smarzynska, B.K. & S.-J. Wei. 2000. Corruption and the Composition of Foreign Direct  
12 Investment: Firm Level Evidence. NBER Working Paper No. 7969.

13 Smilov, D. 2010. Anticorruption Agencies: expressive, Constructivist and Strategic Uses.  
14 Crime, Law & Social Change

15 Smirnova, Larisa. 2014. Political Reform and the Fight Against Corruption in the PRC:  
International experience and the Chinese Model. International Affairs

16 Smith, Brian. 2008. Edmund Burke, the Warren Hastings Trial, and the Moral Dimension of  
17 Corruption. Polity

18 Smith, Charles F. & Brittany D. Parling. 2012. "American Imperialism": A Practitioner's  
19 experience with Extraterritorial Enforcement of the FCPA. University of Chicago Legal Forum

20 Smith, D., H. Stettler & W. Beedles. 1984. An Investigation of the Information Content of  
Foreign Sensitive Payment Disclosures. Journal of Accounting & Economics

21 Smith, Daniel J. 2014. Corruption Complaints, Inequality and Ethnic Grievances in Post-  
22 Biafra Nigeria. Third World Quarterly

23 Smith, Daniel Jordan. 2001. Kinship and Corruption in Contemporary Nigeria. Ethnos  
24 66(3): 344-364.

25 Smith, Daniel Jordan. 2008. A Culture of Corruption: Everyday Deception and Popular  
26 Discontent in Nigeria.

27 Smith, Eric J. 2012. Resolving Ambiguity in the FCPA through Compliance with the OECD  
Convention on Bribery of Foreign Public Officials. Maryland Journal of International Law

28 Smith, L.E. 2014. Is Strict Liability the Answer in the Battle against Foreign Corporate

1 Bribery? Brooklyn Law Review

2 Smith, N. & E. Thomas. 2015. Determinants of Russia's Informal Economy: The Impact of  
3 Corruption and Multinational Firms. Journal of East-West Business

4 Smith, Richard C. 2013. Combating FCPA Charges: Is Resistance Futile? Virginia Journal  
5 of International Law

6 Smith, Russell G. & Penny Jorna. 2012. "Corrupt Misuse of Information and  
7 Communications Technologies", in Adam Graycar & Russell G. Smith eds., Handbook of Global  
8 Research and Practice in Corruption ,

9 Smith, Trevor. 1995. Political Sleaze in Britain: Causes, Concerns, and Cures. Parliamentary  
10 Affairs

11 Smith-Crowe, K. & D. Warren. 2014. The Emotion-Evoked Collective Corruption Model:  
12 The Role of Emotion in the Spread of Corruption within Organizations. Organizational Science

13 Smulovitz, Catalina & Enrique Peeruzzotti. 2000. Societal Accountability in Latin America.  
14 Journal of Democracy

15 Smyth, Russell & Joanne Xiaolei Qian. 2008. Corruption and Left-Wing Beliefs in a Post-  
16 Socialist Transition Economy: Evidence from China's Harmonious Society. Economics Letters .

17 Sneath, D. 2002. Reciprocity and Notions of Corruption in Contemporary  
18 Mongolia. Mongolian Studies

19 Sneath, David. 2006. Transacting and Enacting: Corruption, Obligation, and the Use of  
20 Monies in Mongolia. Ethnos

21 Snider, Thomas R. & Won Kidane. 2007. Combating Corruption Through International Law  
22 in Africa: A Comparative Analysis. Cornell International Law Journal

23 Snow Bailard, Catie. 2009. Mobile Phone Diffusion and Corruption in Africa. Political  
24 Communication.

25 Snyder, James M., Jr. & David Stromberg. 2010. Press Coverage and Political  
26 Accountability. Journal of Political Economy

27 Sohail, M. & S. Cavill. 2008. Accountability to Prevent Corruption in Construction Projects.  
28 Journal of Construction Engineering & Management

Sohmen, Helmut. 1999. Critical Importance of Controlling Corruption. International Law

Somlo, M.J. 2015. Historical Inefficiencies and Future Potential: A Critical Analysis of the  
Foreign Corrupt Practices Act of 1977. International Journal of Economics & Accounting

Song, Xuguang & Wenhao Cheng. 2012. Perceptions of Corruption in 36 Major Chinese  
Cities: Based on Survey of 1,642 experts. Social Indicators Research

1 Soper, Daniel S. & Haluk Demirkan. 2012. How ICTs Affect Democracy and Corruption in  
2 Emerging Societies. IEEE IT Professional

3 Soper, Daniel S. 2007. ICT Investment Impacts on Future Levels of Democracy, Corruption,  
4 and E-Government Acceptance in Emerging Countries. Working paper.

5 Soreide, Tina & Rory Truex. 2013. Multistakeholder Groups for Better Sector Performance:  
6 A Key to Fight Corruption in Natural Resource Governance? Development Policy Review

7 Soreide, Tina, Linda Groning & Rasmus H. Wandall. 2015. An Efficient Anticorruption  
8 Sanctions Regime? The Case of the World Bank. (Working paper.)

9 Soreide, Tina. 2006. Is It Wrong to Rank? A Critical Assessment of Corruption Indices.

10 CMI Working Paper 2006:1. Chr. Michelsen Institute, Bergen.

11 Soreide, Tina. 2008. Beaten by Bribery: Why Not Blow the Whistle? Journal of Institutional  
12 & Theoretical Economics.

13 Soreide, Tina. 2009. Too Risk Averse to Stay Honest? Business Corruption, Uncertainty and  
14 Attitudes Toward Risk. International Review of Law & Economics

15 Soreide, Tina. 2013. "Democracy's Shortcomings in Anti-Corruption", in Susan Rose-  
16 Ackerman & Paul D. Carrington eds., Anti-Corruption Policy: Can International Actors Play a  
17 Constructive Role? (Durham: Carolina Academic Press).

18 Soreide, Tina. 2014. Drivers of Corruption: A Limited Review. Working paper.

19 Sorensen, Juliet. 2012. Ideals without Illusions: Corruption and the Future of a Democratic  
20 North Africa. Northwestern University Journal of International Human Rights

21 Sosa, Luis A. 2004. Wages and Other Determinants of Corruption. Review of Development  
22 Economics.

23 Sovacool, B. & N. Andrews. 2015. does Transparency Matter? Evaluating the Governance  
24 Impacts of the Extractive Industries Transparency Initiative (EITI) in Azerbaijan and Liberia.  
25 Resources Policy

26 Soyaltin, D. 2015. Political Corruption in Comparative Perspective: Sources, Status and  
27 Prospects. Political Studies Review

28 Spagnolo, Giancarlo. 2004. Divide et Imperia: Optimal Leniency Programmes. CEPR  
Discussion Papers 4840.

Spahn, Elizabeth K. 2012. Local Law Provisions under the OECD Anti-Bribery Convention.  
Syracuse Journal of International Law & Commerce

Spahn, Elizabeth K. 2012. Multijurisdictional Bribery Law Enforcement: The OECD Anti-

1 Bribery Convention. Virginia Journal of International Law

2 Spahn, Elizabeth. 2009. Discovering Secrets: Act of State Defenses to Bribery Cases.  
3 Hofstra Law Review

4 Spahn, Elizabeth. 2009. International Bribery: The Moral Imperialism Critiques. Minnesota  
5 Journal of International La

6 Spahn, Elizabeth. 2010. Nobody Gets Hurt? Georgetown Journal of International Law

7 Spalding, Andrew Bradley. 2014. Corruption, Corporations, and the New Human Right.  
8 Washington University Law Review

9 Spalding, Andrew Brady. 2010. Unwitting Sanctions: Understanding Anti-Bribery  
10 Legislation as Economic Sanctions Against Emerging Markets. Florida Law Review

11 Spalding, Andrew Brady. 2011. The Irony of International Business Law: U.S. Progressivism  
12 and China's New Laissez-Faire. UCLA Law Review

13 Spalding, Andrew Brady. 2012. Four Uncharted Corners of Anti-Corruption Law: In  
14 Search of Remedies. Wisconsin Law Review

15 Spalding, Andrew Brady. 2014. Restorative Justice for Multinational Corporations.

16 Sparrow, Malcolm K. 1996. License to Steal: Why Fraud Plagues America's Health Care  
17 System (Westview Press).

18 Speck, Bruno. 2011. "Auditing Institutions", in Timothy Power & Matthew Taylor eds.,  
19 Corruption and Democracy in Brazil: The Struggle for Accountability (Indiana: University of Notre  
20 Dame Press).

21 Spector, Bertram I., ed. 2005. Fighting Corruption in Developing Countries: Strategies and  
22 Analysis. Bloomfield, CT: Kumarian Press.

23 Spector, Bertram I., Michael Johnston & Phyllis Dininio. 2005. "Learning Across Cases:  
24 Trends in Anticorruption Strategies," in Bertram Spector ed. Fighting Corruption in Developing  
25 Countries: Strategies and Analysis (Bloomfield, CT: Kumarian Press)

26 Spence, Matthew J. 2005. American Prosecutors as Democracy Promoters: Prosecuting  
27 Corrupt Foreign Officials in U.S. Courts. Yale Law Journal

28 Spinesi, L. 2009. Rent-Seeking Bureaucracies, Inequality, and Growth. Journal of  
Development Economics

Spinney, Laura. 2011. The Underhand Ape: Why We Are All Corrupt. New Scientist

Sporkin, Stanley. 1998. The Worldwide Banning of Schmiergeld: A Look at the Foreign  
Corrupt Practices Act on its Twentieth Birthday. Northwestern Journal of International Law &



Business

Stanig, Piero. 2015. Regulation of Speech and Media Coverage of Corruption: An Empirical Analysis of the Mexican Press. *American Journal of Political Science*

Stansbury, J. & B. Barry. 2007. Ethics Programs and the Paradox of Control. *Business Ethics Quarterly*

Stansbury, Jason M. & Bart Victor. 2009. Whistle-Blowing among Young Employees: A Life-Course Perspective. *Journal of Business Ethics*

Stapenhurst, F., K. Jacobs & R. Pelizzo. 2014. Corruption and Legislatures. *Public Integrity*

Stapenhurst, Rick & Sahr J. Kpundeh eds. 1999. *Curbing Corruption: Toward a Model for Building National Integrity* (Washington, D.C.: World Bank).

Stapenhurst, Rick. 2000. The Media's Rule in Curbing Corruption. Working Paper, World Bank Institute.

Stark, Andrew. 2000. *Conflict of Interest in American Public Life* (Cambridge: Harvard University Press).

Starr, Sonja. 2007. Extraordinary Crimes at Ordinary Times: International Justice Beyond Crisis Situations. *Northwestern University Law Review*

Stead, D. 2015. What does the Quality of Government Imply for Urban Prosperity? *Habitat International*

Stefes, Christoph H. 2007. Measuring, Conceptualizing, and Fighting Systemic Corruption: Evidence from Post-Soviet Countries. *Perspectives on Global Issues*

Stein, Alex. 2012. Corrupt Intentions: Bribery, Unlawful Gratuity, and Honest-Services Fraud. *Law & Contemporary Problems*

Stein, Elizabeth A. & Marisa Kellam. 2014. Programming Presidential Agendas: Partisan and Media Environments that Lead Presidents to Fight Crime and Corruption. *Political Communication*

Steinitz, Maya & Paul A. Gowder, Jr. 2014. Corruption and the Transnational Litigation Prisoners' Dilemma. Working paper.

Stensota, Helena, Lena Wangnerud & Richard Svensson. 2015. Gender and Corruption: The Mediating Power of Institutional Logics. *Governance*

Stephan, Paul B. 1999. Rationality and Corruption in the Post-Socialist World. *Connecticut Journal of International Law*

Stephan, Paul B. 2013. Regulatory Competition and Anticorruption Law. *Virginia Journal of International Law Digest*



Stephenson, Kevin, Larissa Gray & Ric Power. 2011. Barriers to Asset Recovery: An Analysis of the Key Barriers and Recommendations for Action. Washington, D.C.: Stolen Asset Recovery Initiative.

Stephenson, Matthew C. 2015. "Corruption and Democratic Institutions: A Review and Synthesis", in Susan Rose-Ackerman & Paul Lagunes eds., Greed, Corruption, and the Modern State

Stepurko, T., M. Pavlova, I. Gryga & W. Groot. 2010. Empirical Studies on Informal Patient Payments for Health Care Services: A Systematic and Critical Review of Research Methods and Instruments. BMC Health Services Research

Stessens, Guy. 2001. The International Fight Against Corruption. International Review of Penal Law

Stevens, P. 2003. Resource Impact: Curse or Blessing? A Literature Survey. Journal of Energy Literature

Stevenson, Drury D. & Nicholas J. Wagoner. 2011. FCPA Sanctions: To Big to Debar? Fordham Law Review

Steves, Franklin & Alan Rousso. 2003. Anti-Corruption Programmes in Post-Communist Transitions Countries and Changes in the Business Environment, 1999-2002. EBRD

Stevulak, C. & M.P. Brown. 2011. Activating Public Sector Ethics in Transitional Societies. Public Integrity

Stewart, Carter. 2012. The FCPA Is Just as Relevant and Necessary Today as Thirty-Five Years Ago. Ohio State Law Journal

Stinson, P.M., J. Liederbach, S.L. Brewer, H.D. Schmalzried, B.E. Mathna, & K.L.

Long. 2013. A Study of Drug-related Police Corruption Arrests. Policing: An International Journal of Police Strategies & Management

Stockemer, Daniel & Aksel Sundstrom. 2013. Corruption and Citizens' Satisfaction with Democracy in Europe: What Is the Empirical Linkage? Comparative Governance & Politics .

Stockemer, Daniel, Bernadette LaMontagne & Lyle Scruggs. 2012. Bribes and Ballots: The Impact of Corruption on Voter Turnout in Democracies. International Political Science Review

Stokes, Susan C. 2005. Perverse Accountability: A Formal Model of Machine Politics with Evidence from Argentina. American Political Science Review

Stolen Assets Recovery Initiative. 2012. Public Office, Private Interests: Accountability through Income and Asset Disclosure. Washington, D.C.: Stolen Asset Recovery Initiative.

Pg 1760 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 Stolenberg, Clyde D. Globalization, “Asian Values,” and Economic Reform: The Impact of  
2 Tradition and Change on Ethical Values in Chinese Business. Cornell International Law Journal

3 Stone, B. 2015. Accountability and the Design of an Anticorruption Agency in a  
4 Parliamentary Democracy. Policy Studies

5 Strader, J. Kelly. 2011. Skilling Reconsidered: The Legislative-Judicial Dynamic, Honest  
6 Services Fraud, and the Ill-Conceived “Clean Up Government Act”. Fordham Urban Law Journal

7 Stratmann, Thomas. 2003. Do Strict Electoral Campaign Finance Rules Limit Corruption?  
8 CESinfoDICE Report

9 Straub, Stephane. 2005. Corruption and Product Market Competition. ESE Discussion  
10 Papers 131 (Edinburgh School of Economics, University of Edinburgh) Straub, Stephane. 2008.  
11 Opportunism, Corruption and the Multinational Firm’s Mode of Entry. Journal of International  
12 Economics

13 Straub, Stephane. 2009. Regulatory Intervention, Corruption and Competition. Review of  
14 Industrial Organization

15 Straub, Stephane. 2015. “The Story of Paraguayan Dams: The Long-Term Consequences of  
16 Wrongdoing in Procurement”, in Susan Rose-Ackerman & Paul Lagunes eds., Greed, Corruption,  
17 and the Modern State

18 Strauss, David A. 1994. Corruption, Equality, and Campaign Finance Reform. Columbia  
19 Law Review .

20 Strauss, Emily N. 2013. “Easing Out” the FCPA Facilitation Payment Exception. Boston  
21 University Law Review

22 Stremlau, N., E. Fantini & I. Gagliardone. 2015. Patronage, Politics and Performance: Radio  
23 Call-In Programmes and the Myth of Accountability. Third World Quarterly

24 Stringhini S., S. Thomas, P. Bidwell, T. Mtui & A. Mwisongo. 2009. Understanding  
25 Informal Payments in Health Care: Motivation of Health Workers in Tanzania. Human Resources  
26 for Health

27 Stromberg, David. 2001. Mass Media and Public Policy. European Economic Review 4.

28 Stromberg, David. 2004. Mass Media Competition, Political Competition, and Public  
Policy. Review of Economic Studies.

Stromberg, David. 2004. Radio’s Impact on Public Spending. Quarterly Journal of  
Economics

Subedi, M.S. 2006. Corruption in Nepal: An Anthropological Inquiry. Journal of Sociology  
& Anthropology

Sukhtankar, Sandip. 2012. Sweetening the Deal? Political Connections and Sugar Mills in

India. American Economic Journal: Applied Economics

Sukhtankar, Sandip. 2015. The Impact of Corruption on Consumer Markets: Evidence from the Allocation of Second-Generation Wireless Spectrum in India. Journal of Law & Economics

Summerfield, Jason Noah. 2009. The Corruption Defense in Investment Disputes: A Discussion of the Imbalance between International Discourse and Arbitral Decisions. Transnational Dispute Management

Sun, X., J. Zhu & Y. Wu. 2014. Organizational Clientalism: An Analysis of Private Entrepreneurs in Chinese Local Legislatures. Journal of East Asian Studies

Sun, Y. 2001. The Politics of Conceptualizing Corruption in Reform China. Crime, Law & Social Change.

Sun, Yan & Michael Johnston. 2009. Does Democracy Check Corruption? Insights from China and India. Comparative Politics

Sun, Yan. 1999. Reform, State, and Corruption: Is Corruption Less Destructive in China than in Russia? Comparative Politics

Sun, Yan. 2004. Corruption and Market in Contemporary China.

Sun, Yan. 2009. "Cadre Recruitment and Corruption: What Goes Wrong?", in Gong, T. & S.K. Ma eds., Preventing Corruption in Asia: Institutional Design and Policy Capacity (London: Routledge),

Sundell, Anders. 2012. Legalize It: An Argument for Formalizing Petty Corruption when State Capacity is Low. QoG Working Paper Series

Sundell, Anders. 2012. What Is the Best Way to Recruit Public Servants? QoG Working Paper Series

Sundell, Anders. 2013. Nepotism in the Swedish Central Public Administration 1790-1925.

Sundell, Anders. 2014. Are Formal Civil Service Examinations the Most Meritocratic Way to Recruit Civil Servants? Not in All Countries. Public Administration

Sundell, Anders. 2014. Understanding Informal Payments in the Public Sector: Theory and Evidence from Nineteenth Century Sweden. Scandinavian Political Studies

Sundet, Geir. 2007. Public expenditure Tracking Studies: Lessons from Tanzania. U4 Brief No. 14 (Bergen: Chr. Michelsen Institute).

Sundet, Geir. 2008. Following the Money: Do Public expenditure Tracking Surveys Matter? U4 Issue 2008:8. Bergen, Norway: U4 Anti-Corruption Resource Center.

Sundstrom, A. & D. Stockemer. 2015. Voter Turnout in the European Regions: The Impact of Corruption Perceptions. Electoral Studies

1 Sundstrom, A. 2015. Covenants with Broken Swords: Corruption and Law Enforcement in  
2 Governance of the Commons. Global Environmental Change—Human & Policy Dimensions

3 Sundstrom, Aksel & Lena Wangnerud. 2014. Corruption as an Obstacle to Women's  
4 Political Representation: Evidence from Local Councils in 18 European Countries. Party Politics .

5 Sundstrom, Aksel. 2012. Corruption and Regulatory Compliance: experimental Findings  
6 from South African Small-Scale Fisheries. Marine Policy

7 Sundstrom, Aksel. 2013. Corruption in the Commons: Why Bribery Hampers Enforcement  
8 of Environmental Regulations in South African Fisheries. International Journal of the Commons

9 Sung, Hung-En & Doris Chu. 2003. does Participation in the World Economy Reduce  
10 Political Corruption? An Empirical Inquiry. International Journal of Comparative Criminology

11 Sung, Hung-En. 2002. A Convergence Approach to the Analysis of Political Corruption: A  
12 Cross-National Study. Crime, Law & Social Change

13 Sung, Hung-En. 2003. Fairer Sex or Fairer System? Gender and Corruption Revisited.  
14 Social Forces

15 Sung, Hung-En. 2004. Democracy and Political Corruption: A Cross-National Comparison.  
16 Crime, Law & Social Change

17 Sung, Hung-En. 2005. Between Demand and Supply: Bribery in International Trade. Crime,  
18 Law & Social Change

19 Sung, Hung-En. 2006. From Victims to Saviors? Women, Power, and Corruption. Current  
20 History

21 Sung, Hung-En. 2009. Transnational Corruption in Weapon Procurement in East Asia: A  
22 Case Analysis. Sociological Focus

23 Sung, Hung-En. 2012. Women in Government, Public Corruption, and Liberal Democracy:  
24 A Panel Analysis. Crime, Law & Social Chang

25 Sunstein, Cass R. 1998. Bad Incentives and Bad Institutions. Georgetown Law Journal

26 Suphachalasai, Suphachol. 2005. Bureaucratic Corruption and Mass Media. Working Paper.

27 Suriya, Komsan & Sumate Pruekruedee. 2014. Bounded Rational Corruptoin Model.

28 Empirical Econometrics & Quantitative Economics Letters 3(1): 1-32.

Surjadinata, Kenneth U. 1998. Revisiting Corrupt Practices from a Market Perspective.  
Emory Int'l L.

Suryadarma, Daniel. 2012. How Corruption Diminishes the Effectiveness of Public

1 Spending on Education in Indonesia. Bulletin of Indonesian Economic Studies 48(1): 85-100.

2 Sutherland, E. 2014. Corruption and Internet Governance. Info

3 Sutherland, E. 2015. Bribery and Corruption in Telecommunications—The Kingdom of  
4 Morocco..

5 Svensson, Jakob. 2000. Foreign Aid and Rent-Seeking. Journal of International Economics.

6 Svensson, Jakob. 2003. Who Must Pay Bribes and How Much? Evidence from a Cross  
7 Section of Firms. Quarterly Journal of Economics

8 Svensson, Jakob. 2005. Eight Questions about Corruption, J. Econ. Perspectives,

9 Swaleheen, Mushfiq us. 2007. Corruption and Investment Choices: A Panel Data Study.  
10 Kyklos

11 Swaleheen, Mushfiq us. 2008. Corruption and Saving in a Panel of Countries. Journal of  
12 Macroeconomics

13 Swaleheen, Mushfiq. 2011. Economic Growth with Endogenous Corruption: An Empirical  
14 Study. Public Choice

15 Swamy, Anand, Stephen Knack, Young Lee & Omar Azfar. 2001. Gender and Corruption.  
16 Journal of Development Economics

17 Swanson, Todd. 2007. Greasing the Wheels: British Deficiencies in Relation to American  
18 Clarity in International Anti-Corruption Law. Georgia Journal of International & Comparative Law

19 Syfert, Scott D. 1999. Capitalism or Corruption? Corporate Structure, Western Investment  
20 and Commercial Crime in the Russian Federation. N.Y.L. Sch. J. Int'l & Comp.

21 Szanto, Z. 1999. Principals, Agents, and Clients: Review of the Modern Concept of  
22 Corruption. Innovation: The European Journal of the Social Sciences

23 Szarek-Mason, Patrycja. 2014. "OLAF: The Anti-Corruption Policy within the European  
24 Union", in Jean-Bernard Auby, Emmanuel Breen & Thomas Perroud eds., Corruption and Conflicts  
25 of Interest: A Comparative Law Approach

26 Szeftel, Morris. 1998. Misunderstanding African Politics: Corruption and the Governance  
27 Agenda. Review of African Political Economy

28 Szeftel, Morris. 2000. Between Governance & Under-Development: Accumulation &  
Africa's 'Catastrophic Corruption'. Review of African Political Economy

Szeftel, Morris. 2000. Clientalism, Corruption and Catastrophe. Review of African Political  
Economy

Tabish, S.Z.S. & Kumar Neeraj Jha. 2012. The Impact of Anti-Corruption Strategies on

Corruption Free Performance in Public Construction Projects. Construction Management & Economics

Takyi-Asiedu, Stephen. 1993. Some Socio-Cultural Factors Retarding Entrepreneurial Activity in Sub-Saharan Africa. *Journal of Business Venturing*

Tamashasky, Eric. 2004. The Lewis Carroll Offense: The Ever-Changing Meaning of “Corruptly” Within the Federal Criminal Law. *Journal of Legislation*

Tambulasi, R.I.C. 2009. The Public Sector Corruption and Organised Crime Nexus: The Case of the Fertiliser Subsidy Programme in Malawi. *African Security Review* 1

Tamm, I., C. Lucky & S. Humphreys. 2005. Legal Remedies for the Resource Curse: A Digest of experience in Using Law to Combat Natural Resource Corruption.

Tangri, Roger & Andrew M. Mwenda. 2001. Corruption and Cronyism in Uganda’s Privatisation in the 1990s. *African Affairs*

Tangri, Roger & Andrew M. Mwenda. 2003. Military Corruption and Ugandan Politics Since the Late 1990s. *Review of African Political Economy* 98:

Tangri, Roger & Andrew M. Mwenda. 2006. Politics, Donors and the Ineffectiveness of Anti-Corruption Institutions in Uganda. *Journal of Modern African Studies*

Tannenbaum, Brette M. 2012. Reframing the Right: Using Theories of Intangible Property to Target Honest Services Fraud After Skilling. *Columbia Law*

Tansung, Cagla. 2014. “The Legal Regulations for the Prevention of Corruption of Civil Servants in Turkey and the Council of Ethics for Public Service”, in Jean-Bernard Auby, Emmanuel Breen & Thomas Perroud eds., *Corruption and Conflicts of Interest: A Comparative Law Approach*

Tanzi, Vito & Hamid R. Davoodi. 1997. Corruption, Public Investment and Growth. *International Monetary Fund Working Paper No. 97/139*.

Tanzi, Vito. 1995. Corruption, Governmental Activities, and Markets. *Finance & Development*

Tanzi, Vito. 1998. Corruption Around the World: Causes, Consequences, Scope and Cures. *IMF Staff Papers*

Tanzi, Vito. 2000. *Policies, Institutions and the Dark Side of Economics* (Cheltenham, UK: Edward Elgar).

Tarullo, Daniel K., Claire M. Dickerson, Joel Paul & Susan Rose-Ackermanl. 2000.

Political Corruption as an International Offense. *Proceedings of the Annual Meeting (American Society of International Law)* 94: 56-59

Tarullo, Daniel. 2004. The Limits of Institutional Design: Implementing the OECD Anti-

1 Bribery Convention. Virginia Journal of International Law

2 Tarun, Robert W. & Peter P. Tomczak. 2010. A Proposal for a United States Department of  
3 Justice Foreign Corrupt Practices Act Leniency Policy. American Criminal Law Review

4 Tavares, Jose. 2003. does Foreign Aid Corrupt? Economic Letters

5 Tavares, Samia Costa. 2007. Do Rapid Political and Trade Liberalizations Increase  
6 Corruption? European Journal of Political Economy

7 Tavits, Margit & Joshua D. Potter. 2012. Electoral Institutions and Corruption in Campaign  
8 Finance. .

9 Tavits, Margit. 2007. Clarity of Responsibility and Corruption. American Journal of  
10 Political Science.

11 Tavits, Margit. 2008. Representation, Corruption, and Subjective Well-Being. Comparative  
12 Political Studies

13 Tavits, Margit. 2010. Why Do People Engage in Corruption? The Case of Estonia. Social  
14 Forces

15 Taylor, Cherie O. 2008. The Foreign Corrupt Practices Act: A Primer. International Trade  
16 Law Journal

17 Taylor, Jennifer Dawn. 2001. Ambiguities in the Foreign Corrupt Practices Act:  
18 Unnecessary Costs of Fighting Corruption? Louisiana Law Review

19 Taylor, Scott D. 2006. Divergent Politico-Legal Responses to Past Presidential Corruption  
20 in Zambia and Kenya: Catching the “Big Fish”, or Letting Them Off the Hook? Third World  
21 Quarterly

22 Teachout, Zephyr. 2009. The Anti-Corruption Principle. Cornell Law Review

23 Teachout, Zephyr. 2014. Corruption in America (Cambridge: Harvard University Press).

24 Teixeira, A.A.C. & L. Guimaraes. 2015. Corruption and FDI: does the Use of Distinct  
25 Proxies for Corruption Matter? Journal of African Business

26 Teksoz, S. Utku. 2004. Corruption and Foreign Direct Investment: An Empirical Analysis.  
27 Working paper.

28 Tenbrunsel, A.E. & D.M. Messick. 1999. Sanctioning Systems, Decision Frames, and  
Cooperation. Administrative Science Quarterly

Tenbrunsel, Ann E. & David E. Messick. 2004. Ethical Fading: The Role of Self-Deception  
in Unethical Behavior. Social Justice Research

Tenbrunsel, Ann E., K. Smith-Crowe & E.E. Umphress. 2003. Building Houses on Rocks:



The Role of the Ethical Infrastructure in Organizations. Social Justice Research

Tenbrusel, A.E. & K. Smith-Crowe. 2008. Ethical Decision Making: Where We've Been and Where We're Going. Academy of Management Annals

Teorell, Jan & Bo Rothstein. 2015. Getting to Sweden, Part I: War and Malfeasance, 1720-1850. Scandinavian Political Studies

Teorell, Jan. 2007. Corruption as an Institution: Rethinking the Origins of the Grabbing Hand. QoG Working Paper Series 2007: 5 (The Quality of Government Institute, University of Gothenburg)

Testa, Cecilia. 2010. Bicameralism and Corruption. European Economic Review

Thachil, Tariq & Emmanuel Teitelbaum. 2015. Ethnic Parties and Public Spending. Comparative Political Studies

Thachuk, Kimberly. 2005. Corruption and International Security. SAIS Review

Thampi, Gopakumar & Sita Sekhar. 2006. "Citizen Report Cards", in Charles Sampford, Arthur Shacklock, Carmel Connors & Fredrik Galtung eds., Measuring Corruption (Aldershot: Ashgate)

Themudo, Nuno S. 2013. Reassessing the Impact of Civil Society: Nonprofit Sector, Press Freedom, and Corruption. Governance

Themudo, Nuno S. 2014. Government Size, Nonprofit Sector Strength, and Corruption: A Cross-National Examination. American Review of Public Administration

Theobald, Robin. 1990. Corruption, Development, and Underdevelopment (Durham: Duke University Press)

Theobald, Robin. 1994. Lancing the Swollen African State: Will It Alleviate the Problem of Corruption? Journal of Modern African Studies

Theobald, Robin. 1997. Can Debt Be Used To Combat Political Corruption in Africa? Crime, Law & Social Change

Theobald, Robin. 1999. So What Really Is the Problem about Corruption? Third World Quarterly

Thomas, Chantal. 1999. does the "Good Governance Policy" of the International Financial Institutions Privilege Markets at the expense of Democracy? Connecticut Journal of International Law

Thomas, Cortney C. 2010. The Foreign Corrupt Practices Act: A Decade of Rapid expansion explained, Defended, and Justified. Review of Litigation 29: 439-470.

Thomas, M.A. & Patrick Meagher. 2004. A Corruption Primer: An Overview of Concepts in



the Corruption Literature. IRIS Discussion Paper No. 04/03.

Thomas, Melissa. 2010. What Do the Worldwide Governance Indicators Measure? European Journal of Development Research 2

Thompson, Dennis F. 1985. Ethics in Congress: From Individual to Institutional Corruption. Washington, D.C.: Brookings Institution.

Thompson, Dennis F. 1993. Mediated Corruption: The Case of the Keating Five. American Political Science Review

Thompson, Dennis F. 2005. Two Concepts of Corruption: Making Campaigns Safe for Democracy. George Washington Law Review

Thompson, L.D. 2014. In-Sourcing Corporate Responsibility for Enforcement of the Foreign Corrupt Practices Act. American Criminal Law Review

Thompson, Robin & Ana Xavier. 2003. Unofficial Payments for Acute State Hospital Care in Kazakhstan: A Model of Physician Behavior with Price Discrimination and Vertical Service Differentiation. Royal Economic Society Annual Conference 2003, 224.

Thornton, J. 2008. Corruption and the Composition of Tax Revenue in Middle East and African Economies. South African Journal of Economics

Thornton, M. 2002. Corruption and Foreign Aid.

Thoumi, Francisco E. 1987. Some Implications of the Growth of the Underground Economy in Columbia. J. Interamerican Stud. & World Af.

Tian, P. 2015. A Tale of Two Systems. Nature

Tian, Xiaowen & Vai Io Lo. 2009. Conviction and Punishment: Free Press and Competitive Elections as Deterrents to Corruption. Public Management Review

Tignor, Robert L. 1993. Political Corruption in Nigeria Before Independence. Journal of Modern African Studies

Tillipman, Jessica. 2012. A House of Cards Falls: Why “Too Big to Debar” Is All Slogan and Little Substance. Fordham Law Review Res Getae

Timamy, K.M.H. 2005. African Leaders and Corruption. Review of African Political Economy .

Timmons, J.F. & F. Garifas. 2015. Revealed Corruption, Taxation, and Fiscal Accountability: Evidence from Brazil. World Development.

Timofeyev, Y. 2015. Analysis of Predictors of Organizational Losses Due to Occupational Corruption. International Business Review

Pg 1768 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Ting, Michael M. 2008. Whistleblowing. American Political Science Review
- 2 Tirole, Jean. 1986. Hierarchies and Bureaucracies—On the Role of Collusion in
- 3 Organizations. Journal of Law, Economics, & Organization .
- 4 Tirole, Jean. 1996. A Theory of Collective Reputations with Applications to the Persistence
- 5 of Corruption and to Firm Quality Review of Economic Studies
- 6 Tiwari, Aviral Kumar. 2012. Corruption, Democracy and Bureaucracy. Theoretical &
- 7 Applied Economics
- 8 To, Phuc Xuan, Sango Mahanty & Wolfram Dressler. 2014. Social Networks of Corruption
- 9 in the Vietnamese and Lao Cross-Border Timber Trade. Anthropological Forum.
- 10 Tomaszewksa, Ewa & Anwar Shah. 2000. Phantom Hospitals, Ghost Schools and Roads to
- 11 Nowhere: The Impact of Corruption on Public Service Delivery Performance in Developing
- 12 Countries. (World Bank Working Paper).
- 13 Tomini, S. & H. Maarse. 2011. How Do Patient Characteristics Influence Informal
- 14 Payments for Inpatient and Outpatient Health Care in Albania: Results of Logit and OLS Models
- 15 Using Albanian LSMS 2005. BMC Public Health
- 16 Tomsa, D. 2015. Local Politics and Corruption in Indonesia’s Outer Islands. Journal of the
- 17 Humanities & Social Sciences of Southeast Asia & Oceania 171(2-3): 196-.
- 18 Tonoyan, Vartuhi, M. Perlitz & W.W. Wittmann. 2004. “Corruption and Entrepreneurship:
- 19 Unwrittten Codes of Conduct, Trust and Social Values, East-West Comparison”, in Frontiers of
- 20 Entrepreneurship (Babson Park: Babson College)
- 21 Tonoyan, Vartuhi, Robert Strohmeyer, Moshin Habib & Manfred Perlitz. 2010.
- 22 Corruption and Entrepreneurship: How Formal and Informal Institutions Shape Small Firm
- 23 Behavior in Transition and Mature Market Economies. Entrepreneurship: Theory & Practice .
- 24 Tonoyan, Vartuhi. 2003. Corruption and Entrepreneurship: does Trust Matter? Journal of
- 25 Transforming Economies & Societies
- 26 Tonoyan, Vartuhi. 2005. “The Dark Side of Trust: Corruption and Entrpreneurship”, in H.
- 27 Hohmann & F. Welter eds., Trust and Entrepreneurship: A West-East-Perspective (Cheltenham:
- 28 Edward Elgar)
- Torenvlied, Rene & Carolien M. Klein Haarhuis. 2008. Polarization and Policy Reform:
- Anti-Corruption Policymaking in Sub-Saharan Africa. Journal of Peace Research
- Torgler, Benno & Bin Dong. 2009. Corrupttion and Political Interest: Empirical Evidence at
- the Micro Level. Journal of Interdisciplinary Economics
- Torgler, Benno & Marco Piatti. 2013. Extraordinary Wealth, Globalization, and Corruption.
- Review of Income & Wealth.

- 1 Torgler, Benno & Neven T. Valev. 2006. Corruption and Age. Journal of Bioeconomics
- 2 Torgler, Benno & Neven T. Valev. 2007. Public Attitudes toward Corruption and Tax
- 3 Evasion: Investigating the Role of Gender Over Time. Working paper.
- 4 Torgler, Benno & Neven T. Valev. 2010. Gender and Public Attitudes toward Corruption
- 5 and Tax Evasion. Contemporary Economic Policy
- 6 Torgler, Benno. 2004. Tax Morale, Trust and Corruption: Empirical Evidence from
- 7 Transition Countries. Working paper.
- 8 Tornell, A. & P. Lane. 1999. Voracity and Growth. American Economic Review
- 9 Tornell, Aaron & Philip Lane. 1999. The Voracity Effect. American Economic Review
- 10 Tornell, Aaron & Philip R. Lane. 1998. Are Windfalls a Curse? A Non-Representative
- 11 Agent Model of the Current Account. Journal of International Economics 44: 83-112.
- 12 Torres-Fowler, R. Zachary & Kenneth Anderson. 2011. The Bribery Act's New Approach to
- 13 Corporate Hospitality. Virginia Journal of International Law Digest
- 14 Torres-Fowler, R. Zachary. 2012. Undermining ICSID: How the Global Antibribery Regime
- 15 Impairs Investor-State Arbitration. Virginia Journal of International Law
- 16 Torrez, Jimmy. 2002. The Effect of Openness on Corruption. Journal of International Trade
- 17 & Economic Development
- 18 Torsello, Davide. 2010. Corruption and the Economic Crisis: Empirical Indications from
- 19 Eastern Europe. Slovak Foreign Policy Affair
- 20 Torsello, Davide. 2011. The Ethnographic Study of Corruption: Research Themes in
- 21 Political Anthropology. Working Paper 2011:2, Quality of Government Institute, University of
- 22 Gothenburg.
- 23 Torsello, Davide. 2012. Environmental Activism, Corruption and Local Responses to the
- 24 EU Enlargement: Case Studies from Eastern and Western Europe. Urbanites 1(1): 54-59.
- 25 Torsello, Davide. 2015. "The Ethnographic Study of Corruption: Methodology and Research
- 26 Focuses", in Paul M. Heywood ed., The Routledge Handbook of Political Corruption (New York:
- 27 Routledge)
- 28 Torvik, Ragnar 2002. Natural Resources, Rent Seeking and Welfare. Journal of
- Development Economics
- Tosun, M.U., M.O. Yurdakul & Varol Iyidogan. 2014. The Relationship between Corruption
- and Foreign Direct Investment Inflows in Turkey: An Empirical Examination. Transylvanian
- Review of Administrative Sciences

Pg 1770 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Townsend, Janet G. & Alan R. Townsend. 2004. Accountability, Motivation and Practice: NGOs North and South. Social & Cultural Geography

Toye, John & Mick Moore. 1998. Taxation, Corruption and Reform. European Journal of Development Research

Tran, Anh. 2011. Which Regulations Reduce Corruption? Evidence from the Internal Records of a Bribe-Paying Firm.

Tran, Ngoc Anh. 2010. "Corruption, Political Systems and Human Development," in A.K. Rajivan & R. Gampat eds., Perspectives on Corruption and Human Development (McMillan)

Trautman, Lawrence J. & Kara Altenbaumer-Price. 2011. The Foreign Corrupt Practices Act: Minefield for Directors. Virginia Law & Business Review

Treisman, Daniel. 2000. The Causes of Corruption: A Cross National Study. Journal of Public Economics

Treisman, Daniel. 2006. Fiscal Decentralization, Governance, and Economic Performance: A Reconsideration. Economics & Politic

Treisman, Daniel. 2007. What Have We Learned About Causes of Corruption from Ten Years of Cross-National Empirical Research? Annual Review of Political Science

Treisman, Daniel. 2015. "What does Cross-National Emperical Research Reveal About the Causes of Corruption?" , in Paul M. Heywood ed., The Routledge Handbook of Political Corruption (New York: Routledge)

Trevino, L.K. & G.R. Weaver. 2001. Organizational Justice and Ethics Program Follow Through: Influences on Employees' Helpful and Harmful Behavior. Business Ethics Quarterly

Trevino, L.K. & G.R. Weaver. 2003. Managing Ethics in Business Organizations (Stanford, CA: Stanford Business Books).

Trevino, L.K. & S.A. Youngblood. 1990. Bad Apples in Bad Barrels: A Causal Analysis of Ethical Decision-Making Behavior. Journal of Applied Psychology

Trevino, Linda K., G.R. Weaver, D. Gibson & B. Toffler. 1999. Managing Ethics and Legal Compliance: What Works and What Hurts. California Management Review

Trevino, Linda K., Gary R. Weaver & Scott J. Reynolds. 2006. Behavior Ethics in Organizations: A Review. Journal of Management

Trivunovic, M., J. Johnson & N. Taxell. 2013. The Role of Civil Society in the UNCAC Review Process: Moving Beyond Compliance? U4 Issue 2013:4 (Bergen: CMI).

Tromme, M. & M.A.L. Otaola. 2014. Enrique Pena Nieto's National Anti-Corruption Commission and the Challenges of Waging War Against Corruption in Mexico. Mexican Studies

Pg 1771 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Trongmateerut, P. & J.T. Sweeney. 2013. The Influence of Subjective Norms on Whistle-  
Blowing: A Cross-Cultural Investigation. *Journal of Business Ethics* 112(3): 437-451.
- 2
- 3 Tronnes, Robert D. 2000. Ensuring Uniformity in the Implementation of the 1997 OECD  
Convention on Combating Bribery of Foreign Public Officials in International Business  
4 Transactions. *George Washington International Law Review*
- 5
- 6 Trost, Christine & Alison L. Gash. 2008. *Conflict of Interest and Public Life: Cross-National  
Perspectives*. Cambridge: Cambridge University Press.
- 7
- 8 Truex, Rory & Tina Soreide. 2011. "Why Multi-Stakeholder Groups Succeed and Fail", in  
International Handbook on the Economics of Corruption, Vol. II. (Edward Elgar Publishing).
- 9
- 10 Truex, Rory. 2011. *Corruption, Attitudes, and Education: Survey Evidence from Nepal*.  
World Development
- 11
- 12 Trzcinski, Leah M. 2013. The Impact of the Foreign Corrupt Practices Act on Emerging  
Markets: Company Decision-Making in a Regulated World. *New York University Journal of  
13 International Law & Politics*
- 14
- 15 Tsalikis, John & Osita Nwachukwu. 1991. A Comparison of Nigerian to American Views of  
Bribery and Extortion in International Commerce. *Journal of Business Ethics*
- 16
- 17 Tudoroiu, Theodor. 2014. *Democracy and State Capture in Moldova*. Democratization.
- 18
- 19 Tullock, Gordon. 1996. *Corruption Theory and Practice*. Contemporary Economic Policy
- 20
- 21 Tummala, Krishna K. 2002. *Corruption in India: Control Measures and Consequences*.  
Asian Journal of Political Science.
- 22
- 23 Turk, Matthew C. 2013. A Political Economy Approach to Reforming the Foreign Corrupt  
Practices Act. *Northwestern Journal of International Law & Business*
- 24
- 25 Turner, Wayne. 2009. *The False Claims Act: How Vigilantes Find Justice Fighting  
Government Fraud and Corruption*. University of the District of Columbia Law Review
- 26
- 27 Tusalem, R.F. 2015. *State Regulation of Religion and the Quality of Governance*. Politics &  
Policy
- 28
- 29 Tverdova, Yuliya V. 2011. See No Evil: Heterogeneity in Public Perception of Corruption.  
*Canadian Journal of Political Science*
- 30
- 31 Tyburski, M.D. 2014. Curse or Cure? Migrant Remittances and Corruption. *Journal of  
Politics*
- 32
- 33 Tyler, Andrew. 2011. Enforcing Enforcement: Is the OECD Anti-Bribery Convention's Peer  
Review Effective? *George Washington International Law Review*
- 34
- 35 Tyler, Tom R. & Steven L. Blader. 2005. Can Businesses Effectively Regulate Employee

1 Conduct? The Antecedents of Rule Following in Work Settings. Academy of Management Journal

2 Uberti, L.J. 2014. Is Separation of Powers a Remedy for the Resource Curse? Firm  
3 Licensing, Corruption and Mining Development in Post-War Kosovo. New Political Economy

4 Uche, R.D. 2014. Students' Perception of Corrupt Practices Among Nigerian Universities  
5 Lecturers. American Journal of Humanities & Social Sciences

6 Uchendu, F.N. & T.O. Abolarin. 2015. Corrupt Practices Negatively Influenced Food  
7 Security and Life expectancy in Developing Countries. Pan African Medical Journal

8 Udin, M. Bashir. 2014. Human Trafficking in South Asia: Issues of Corruption and Human  
9 Security. International Journal of Social Work & Human Services

10 Udombana, Nsongurua J. 2003. Fighting Corruption Seriously? Africa's Anti-Corruption  
11 Convention. Sing. J. Int'l & Comp.

12 Ugol'nitskii, G.A. & A.B. Usov. 2014. Dynamic Models of Struggle against Corruption in  
13 Hierarchical Management Systems of exploitation of Biological Resources. Journal of Computer &  
14 Systems Sciences International

15 Ugur, M. & N. Dasgupta. 2011. Evidence on the Economic Growth Impacts of Corruption in  
16 Low-Income Countries and Beyond: A Systematic Review. University of London, EPPI-Centre.

17 Ugur, Mehmet. 2014. Corruption's Direct Effects on Per-Capita Income Growth: A Meta-  
18 Analysis. Journal of Economic Surveys .

19 Uhlenbruck, K., P. Rodriguez, J. Doh & L. Eden. 2006. The Impact of Corruption on Entry  
20 Strategy: Evidence from Telecommunication Projects in Emerging Economies. Organization  
21 Science

22 Ujhelyi, Gergely. 2014. Civil Service Rules and Policy Choices: Evidence from U.S. State  
23 Governments. American Economic Journal: Economic Policy

24 Ukase, Patrick & Bem Audu. 2015. The Role of Civil Society in the Fight Against  
25 Corruption in Nigeria's Fourth Republic: Problems, Prospects and the Way Forward. European  
26 Scientific Journal

27 Ul Haque, Nadeem & Ratna Sahay. 1996. Corruption and the Rate of Temptation: Do  
28 Government Wage Cuts Close Budget Deficits? Costs of Corruption. IMF Staff Papers

Umek, Lan. 2014. An Application of Subgroup Discovery Algorithm on the Case of  
Decentralization and Quality of Governance in EU. International Public Administration Review

Underkuffler, Laura. 2013. Captured by Evil: The Idea of Corruption in Law. (New Haven:  
Yale University Press).

UNDP Bratislava Regional Centre. 2011. Study on the Role of Social Media for Enhancing  
Public Transparency and Accountability in Eastern Europe and the Commonwealth of Independent

1 States: Emerging Models, Opportunities and Challenges.

2 Ungpakorn, J.G. 2002. From Tragedy to Comedy: Political Reform in Thailand. *Journal of*  
 3 *Contemporary Asia* 32(2): 191-205.

4 United Nations Development Program. 2014. *Anticorruption Strategies: Understanding*  
 5 *What Works, What doesn't and Why, Lessons Learned from the Asia Pacific Region.* (Bangkok: UNDP).

6 United Nations Development Programme. 2005. *Institutional Arrangements to Combat*  
 7 *Corruption: A Comparative Study.*

8 Uribe, L.J. 2014. The Dark Side of Social Capital Re-Examined from a Policy Analysis  
 9 Perspective: Networks of Trust and Corruption. *Journal of Comparative Policy Analysis*

10 Urofsky, Philip, Hee Won (Marina) Moon & Jennifer Rimm. 2012. How Should We  
 11 Measure the Effectiveness of the Foreign Corrupt Practices Act? Don't Break What Isn't Broken—  
 12 The Fallacies of Reform. *Ohio State Law Journal*

13 Urofsky, Philip. 2009. "Recent Trends and Patterns in FCPA Enforcement," in *White Collar*  
 14 *Crime 2009: Prosecutors and Regulators Speak*

15 Uslaner, Eric M. & Bo Rothstein. 2014. *The Historical Roots of Corruption: State Building,*  
 16 *Economic Inequality, and Mass Education.* Working paper.

17 Uslaner, Eric M. 2004. "Trust and Corruption," in Johan Graff Lamsdorf, Markus Taube  
 18 & Matthias Schramm, eds. *The New Institutional Economics of Corruption* (Loundon:  
 19 Routledge)

20 Uslaner, Eric M. 2007. "Inequality and Corruption," in George Mavrotas & Anthony  
 21 Shorrocks, eds. *Advancing Development: Core Themes in Global Economics* (London: Palgrave).

22 Uslaner, Eric M. 2008. *Corruption, Inequality, and the Rule of Law: The Bulging Pocket*  
 23 *Makes the Easy Life.* Cambridge University Press.

24 Uslaner, Eric M. 2009. "Corruption, Inequality, and Trust," in Gert Tinggaard Svendsen  
 25 & Gunnar Lind Haase Svendsen, eds. *Handbook on Social Capital* (London: Edward Elgar).

26 Uslaner, Eric M. 2010. "Tax Evasion, Corruption, and the Social Contract in Transition,"  
 27 in James Alm, Jorge Martinez-Vazquez & Benno Torgler, eds. *Developing Alternative*  
 28 *Frameworks for explaining Tax Compliance* (London: Routledge), pp. 206-225.

Uslaner, Eric M. 2011. *Corruption and Inequality.* CESifo DICE Report

Uslaner, Eric M. 2012. "Counting the Cost of Corruption," in Paul Heywood, ed.



International Handbook of Political Corruption (London: Routledge).

Uslaner, Eric M. 2015. "The Consequences of Corruption" , in Paul M. Heywood ed., The Routledge Handbook of Political Corruption (New York: Routledge), pp. 199-211.

Uzoma Ihugba, B. 2014. A Critical Analysis of the Auditing and Reporting Functions of Nigeria Extractive Industry Transparency Initiative (NEITI) Act 2007. Journal of International Trade Law & Policy 13(3): 232-.

Vachudova, M. 2009. Corruption and Compliance in the EU's Post-Communist Members and Candidates. Journal of Common Market Studies

Vadlamannati, Krishna Chaitanya. 2015. Fighting Corruption or Elections? The Politics of Anti-Corruption Policies in India. Journal of Comparative Economics (forthcoming).

Vagliasindi, Maria. 2011. "Public versus Private Governance and Performance: Evidence from Public Utility Service Provision", in International Handbook on the Economics of Corruption, Vol. II. (Edward Elgar Publishing).

Vaidya, Samarth. 2005. Corruption in the Media's Gaze. European Journal of Political Economy

van Aaken, Anne, Eli Salzberger & Stefan Voigt. 2004. The Prosecution of Public Figures and the Separation of Powers. Confusion Within the Executive Branch--A Conceptual Framework. Constitutional Political Economy

van Aaken, Anne, Lars Feld & Stefan Voigt. 2010. Do Independent Prosecutors Deter Political Corruption? An Empirical Evaluation Across Seventy-Eight Countries, American Law & Economics Review

Van Alstine, Michael P. 2012. Treaty Double Jeopardy: The OECD Anti-Bribery Convention and the FCPA. Ohio State Law Journal

van Biezen, Ingrid & Petr Kopecky. 2007. The State and the Parties: Public Funding, Public Regulation and Rent-Seeking in Contemporary Democracies. Party Politics

van de Mortel, Elma & Peter Cornelisse. 1994. The Dynamics of Corruption and Black Markets: An Application of Catastrophe Theory. Public Finance 49(Supp)

van der does de Willebois, Emile & Jean-Pierre Brun. 2013. Using Civil Remedies in Corruption and Asset Recovery Cases. Case Western Journal of International Law

van der does de Willebois, Emile et al. 2011. The Puppet Masters: How the Corrupt Use Legal Structures to Hide Stolen Assets and What to Do About It. Washington, D.C.: Stolen Asset Recovery Initiative.

van der Ploeg, F. & S. Poelhekke. 2010. The Pungent Smell of "Red Herrings": Subsoil Assets, Rents, Volatility and the Resource Curse. Journal of Environmental Economics & Management



1 Van der Ploeg, F. 2011. Natural Resources: Curse or Blessing? Journal of Economic  
2 Literature

3 van Harn, C. & S.I. Lindberg. 2015. From Sticks to Carrots: Electoral Manipulation in  
4 Africa, 1986-2012. Government & Opposition

5 Van Klinken, Gerry & Edward Aspinall. 2011. "Building Relations: Corruption,  
6 Competition and Cooperation in the Construction Industry", in Edward Aspinall & Gerry Ven  
Klinken eds., The State and Illegality in Indonesia (Leiden: KITLV Press).

7 Van Rijckeghem, Caroline & Beatrice Weder. 2001. "Bureaucratic Corruption and the Rate  
8 of Temptation: Do Wages in the Civil Service Affect Corruption, and By How Much?" J.  
Development Econ.

9 van Rooij, Benjamin. 2005. China's War on Graft: Politico-Legal Campaigns Against  
10 Corruption in China and Their Similarities to the Legal Reactions to Crisis in the U.S. Pacific Rim  
Law & Policy Journal

11 van Vuuren, Hennie. 2014. South Africa: Democracy, Corruption and Conflict Management.  
12 Democracy Works Conference Paper.

13 Vanhanen, T. 1999. Domestic Ethnic Conflict and Ethnic Nepotism. Journal of Peace  
14 Research

15 Vanucci, A. 2009. The Controversial Legacy of 'Mani Pulite': A Critical Analysis of Italian  
16 Corruption and Anti-Corruption Policies. Bulletin of Italian Politics

17 Varese, Federico. 1997. The Transition to the Market and Corruption in Post-Socialist  
18 Russia. Political Studies

19 Varese, Federico. 2015. "Underground Banking and Corruption", in Susan Rose-Ackerman  
& Paul Lagunes eds., Greed, Corruption, and the Modern State ,

20 Varoufakis, Yanis. 2006. The Bonds that Impede: A Model of the Joint Evolution of  
21 Corruption and Apathy. Indian Economic Journal

22 Varvarigos, D. & P. Arsenis. 2015. Corruption, Fertility, and Human Capital. Journal of  
23 Economic Behavior & Organization

24 Vaughn, Robert G. 1990. Ethics in Government and the Vision of Public Service. George  
Washington Law Review

25 Vega, Matt A. 2009. The Sarbanes-Oxley Act and the Culture of Bribery: expanding the  
26 Scope of Private Whistleblower Suits to Overseas Employees. Harvard Journal on Legislation

27 Vega, Matt A. 2010. Balancing Judicial Cognizance and Caution: Whether Transnational  
28 Corporations Are Liable for Foreign Bribery Under the Alien Tort Statute. Michigan Journal of  
International Law

1 Venard, Bertrand. 2009. Corruption in Emerging Countries: A Matter of Isomorphism.  
2 M@n@gement

3 Venard, Bertrand. 2009. Organizational Isomorphism and Corruption: An Empirical  
4 Research in Russia. Journal of Business Ethics

5 Venard, Bertrand. 2013. Institutions, Corruption and Sustainable Development. Economics  
6 Bulletin.

7 Venard, Betrand & Mohamed Hanafi. 2008. Organizational Isomorphism and Corruption in  
8 Financial Institutions: Empirical Research in Emerging Countries. Journal of Business Ethics

9 Ventelou, Bruno. 2002. Corruption in a Model of Growth: Political Reputation, Competition  
10 and Shocks. Public Choice

11 Verardi, Vincenzo. 2004. Electoral Systems and Corruption. Revista Latinoamericana de  
12 Desarrollo Economico

13 Verbrugge, Randal J. 2006. Nonergodic Corruption Dynamics (or, Why Do Some Regions  
14 within a Country Become More Corrupt Than Others?). Journal of Public Economic Theory

15 Verma, Arvind. 1999. Cultural Roots of Police Corruption in India. Policing.

16 Verma, P. & S. Sengupta. 2015. Bribe and Punishment: An Evolutionary Game-Theoretic  
17 Analysis of Bribery.

18 Veron, Rene, Glyn Williams, Stuart Corbridge & Manoj Srivastava. 2006. Decentralized  
19 Corruption or Corrupt Decentralization? Community Monitoring of Poverty-Alleviation Schemes in  
20 Eastern India. World Development

21 Verver, J. 2015. Lessons from the FIFA Corruption Scandal. Risk Management

22 Vian, Taryn & L.J. Burak. 2006. Beliefs About Informal Payments in Albania. Health Policy  
23 & Planning .

24 Vian, Taryn, William D. Savedoff & Harald Mathisen. 2010. Anticorruption in the Health  
25 Sector: Strategies for Transparency and Accountability (Sterling, VA: Kumarian Press).

26 Vian, Taryn. 2009. Review of Corruption in the Health Sector: Theory, Methods and  
27 Interventions. Health Policy & Planning

28 Vicente, Pedro C. & Leonard Wantchekon. 2009. Clientalism and Vote Buying: Lessons  
from Field experiments in African Elections. Oxford Review of Economic Policy

Vicente, Pedro C. 2010. does Oil Corrupt? Evidence from a Natural experiment in West  
Africa. Journal of Development Economics

Vicente, Pedro C. 2011. "Oil, Corruption, and Vote-Buying: A Review of the Case of Sao

Pg 1777 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Tome and Principe”, in International Handbook on the Economics of Corruption, Vol. II. (Edward Elgar Publishing).

Vicente, Pedro C. 2014. Is Vote Buying Effective? Evidence from a Field experiment in West Africa. *Economic Journal*

Vigneswaran, D.V. 2011. Incident Reporting: A Technique for Studying Police Corruption. *Policing & Society*

Villareal, Andres. 2002. Political Corruption and Violence in Mexico: Hierarchical Social Control in Local Patronage Structures. *American Sociological Review*

Vincke, Francois. 1997. How Effective Is the Business Community in Combating Corruption? *American Society of International Law Proceedings*

Vincke, Francois. 2013. Recent Anti-Corruption Initiatives and Their Impact on Arbitration. *ICC International Court of Arbitration Bulletin*

Vinod, Hrishikesh D. 1999. Statistical Analysis of Corruption Data and Using the Internet to Reduce Corruption. *Journal of Asian Economics*

Vinod, Hrishikesh D. 2003. Open Economy and Financial Burden of Corruption: Theory and Application to Asia. *Journal of Asian Economics*

Vinogradov, A. 2014. Government, Business, and Corruption in China. *Far Eastern Affairs*

Vitell, Scott J., Saviour L. Nwachukwu & James H. Barnes. 1993 The Effects of Culture on Ethical Decision-Making: An Application of Hofstede’s Typology. *Journal of Business Ethics*

Vithiatharan, V. & E.T. Gomez. 2014. Politics, Economic Crises and Corporate Governance Reforms: Regulatory Capture in Malaysia. *Journal of Contemporary Asia*

Vivyan, Nick, Markus Wagner & Jessica Tarlov. 2012. Representative Misconduct, Voter Perceptions and Accountability: Evidence from the 2009 House of Commons expenses Scandal. *Electoral Studies*

Vlasic, Mark V. & Gregory Cooper. 2011. Beyond the Duvalier Legacy: What New

“Arab Spring” Governments Can Learn from Haiti and the Benefits of Stolen Asset Recovery. *Northwestern Journal of International Human Rights*

Vlasic, Mark V. & Gregory Cooper. 2011. Repatriating Justice: New Trends in Stolen Asset Recovery. *Georgetown Journal of International Affairs*

Vlasic, Mark V. & Jenae N. Noell. 2010. Fighting Corruption to Improve Global Security: An Analysis of International Asset Recovery Systems. *Yale Journal of International Affairs*. .

Vlasic, Mark V. & Peter Atlee. 2014. Myanmar and the Dodd-Frank Whistleblower

Pg 1778 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 “Bounty”: The U.S. Foreign Corrupt Practices Act and Curbing Grand Corruption through  
2 Innovative Action. American University International Law Review
- 3 Vogl, Frank. 1998. The Supply Side of Global Bribery. Finance & Development
- 4 Vogl, Frank. 2013. Waging War on Corruption: Inside the Movement Fighting the Abuse of  
5 Power.
- 6 Vohs, Kathleen D. & Jonathan W. Schooler. 2008. The Value of Believing in Free Will:  
7 Encouraging a Belief in Determinism Increases Cheating. Psychological Science 19: 49-54.
- 8 Voigt, Lydia & William E. Thornton. 2015. Disaster-Related Human Rights Violations and  
9 Corruption: A 10-Year Review of Post-Hurricane Katrina New Orleans. American Behavioral  
10 Scientist
- 11 Voigt, S. & J. Gutmann. 2015. On the Wrong Side of the Law – Causes and Consequences  
12 of a Corrupt Judiciary. International Review of Law & Economics (forthcoming).
- 13 Voigt, Stefan & Lorenz Blume. 2012. The Economic Effects of Federalism and  
14 Decentralization: A Cross-Country Assessment. Public Choice
- 15 Volrasarn, Thananun & Napat Harnpornchai. 2014. The Estimation of Bounded Rational  
16 Corruption Model. International Journal of Intelligent Technologies & Applied Statistics
- 17 Von Alemann, Ulrich. 2004. The Unknown Depths of Political Theory: The Case for a  
18 Multidimensional Concept of Corruption. Crime, Law & Social Change
- 19 Von Luebke, C. 2010. The Politics of Reform: Political Scandals, Elite Resistance, and  
20 Presidential Leadership in Indonesia. Journal of Current Southeast Asian Affairs,
- 21 Von Maravic, Patrick. 2007. Decentralized Corruption in Germany. Public Administration  
22 Quarterly
- 23 Von Maravic, Patrick. 2007. Public Management Reform and Corruption –  
24 Conceptualizing the Unintended Consequences. Administration & Public Management  
25 Review
- 26 Von Muhlenbrock, Gisela. 1997. Discretion and Corruption: The Chilean Judiciary. Crime,  
27 Law & Social Change .
- 28 Von Rosenvinge, D. Alison. 2009. Global Anti-Corruption Regimes: Why Law Schools  
May Want to Take a Multi-Jurisdictional Approach. German Law Journal
- von Soest, Christian. 2009. Stagnation of a “Miracle”: Botswana’s Governance Record  
Revisited. Working paper.
- Vorster, J.M. 2015. The Possible Contribution of Civil Society in the Moral Edification of  
South African Society: The Example of the “United Democratic Front” and the “Treatment Action

Campaign” (1983-2014). Hervormde Teologiese Studies

Vostroknutova, Ekaterina. 2003. Shadow Economy, Rent-Seeking Activities and the Perils of Reinforcement of the Rule of Law.

Voyer, P.A. & P.W. Beamish. 2004. The Effect of Corruption on Japanese Foreign Direct Investment. Journal of Business Ethics

Wabwile, N. 2015. Transnational Corruption, Violations of Human Rights and States’ Extraterritorial Responsibility: A Case for International Action Strategies. African Journal of Legal Studies

Wade, Robert. 1982. The System of Administrative and Political Corruption: Canal Irrigation in South India. Journal of Development Studies

Wade, Robert. 1984. Irrigation Reform in Conditions of Popular Anarchy: An Indian Case. Journal of Development Economics.

Wade, Robert. 1985. The Market for Public Office: Why the Indian State Is Not Better at Development. World Development

Wadho, W.A. 2014. Education, Rent Seeking and the Curse of Natural Resources. Economics & Politics

Wagner, Benjamin & Leslie Gielow Jacobs. 2009. Retooling Law Enforcement to Investigate and Prosecute Entrenched Corruption: Key Criminal Procedure Reforms for 289

Indonesia and Other Nations. University of Pennsylvania Journal of International Law

Wahyuni, Z., Y. Adriani & Z. Nihaya. 2015. The Relationship Between Religious Orientation, Moral Integrity, Personality, Organizational Climate and Anti Corruption Intentions in Indonesia. International Journal of Social Science & Humanity

Wallace, Claire & Rossalina Latcheva. 2006. Economic Transformation Outside the Law: Corruption, Trust in Public Institutions and the Informal Economy in Transition Countries of Central and Eastern Europe. Europe-Asia Studie

Wallace, J. Clifford. 1998. Resolving Judicial Corruption While Preserving Judicial Independence: Comparative Perspectives. California Western International Law Journal

Wallace, J.J., P.V. Fishback & S. Kantor. 2006. “Politics, Relief, and Reform: Roosevelt’s Efforts to Control Corruption and Political Manipulation during the New Deal”, in E.L. Glaeser & C. Goldin eds., Corruption and Reform: Lessons from America’s Economic History (Chicago: University of Chicago Press)

Wallace-Bruce, Nii Lante. 2000. Corruption and Competitiveness in Global Business— The Dawn of a New Era. Melbourne University Law Review

Waller, Christopher J., Thierry Verdier & Roy Gardner. 2002. Corruption: Top Down or

Bottom Up? Economic Inquiry

Wallis, John Joseph. 2005. Constitutions, Corporations, and Corruption: American States and Constitutional Change, 1842 to 1852. *Journal of Economic History*

Walton, Grant & S. Dix. 2013. Papua New Guinean Understandings of Corruption: Insights from a Nine Province Survey. Working paper.

Walton, Grant W. 2013. An Argument for Reframing Debates about Corruption: Insights from Papua New Guinea. *Asia Pacific Viewpoint*

Walton, Grant. 2009. "Rifling Through Corruption's Baggage: Understanding Corruption Through Discourse Analysis," in M. Dobashi, J. Hooker & P. Madsen eds., *A Survey of International Corporate Responsibility*, Volume 4 (Charlottesville: Philosophy Documentation Centre)

Walton, Grant. 2009. Rural People's Perceptions of Corruption in Papua New Guinea.

Walton, Grant. 2010. A Comparison of Two Papua New Guinean Anti-Corruption Agencies and their Policies.

Walton, Grant. 2011. "The Rise of Economic Discourse: Corruption and Anti-Corruption in the Development Industry," in S.B. Dahiya, K. Chakravarty, N. Rathee & S.V. Lamba eds., *Governance Issues and Corruption* (Rohtak, India: Intellectual Foundation)

Walton, Grant. 2013. Is All Corruption Dysfunctional? Perceptions of Corruption and its Consequences in Papua New Guinea. *Public Administration & Development*

Walton, Grant. 2015. Defining Corruption where the State is Weak: The Case of Papua New Guinea. *Journal of Development Studies*

Wamey, Julius M. 1999. Can Corruption Be Measured? *Bank's World*

Wang, Chin-Shou & Charles Kurzman. 2007. "The Logistics: How to Buy Votes", in Frederic Charles Schaffer ed., *Elections for Sale: The Causes and Consequences of Vote Buying* (Boulder, CO: Lynne Rienner)

Wang, Hongying & James N. Rosenau. 2001. Transparency International and Corruption as an Issue of Global Governance. *Global Governance*.

Wang, K. & S. Tu. 2014. The Influence of National Leader Change on Corruption and Sovereign Rating. *Acta Oeconomica*

Wang, L. & J.K. Murnighan. 2014. Money, Emotions, and Ethics Across Individuals and Countries. *Journal of Business Ethics*

Wang, P. 2014. Extra-Legal Protection in China. *British Journal of Criminology*

Pg 1781 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 Wang, Shing-Yi. 2013. Marriage Networks, Nepotism, and Labor Market Outcomes in  
2 China. American Economic Journal: Applied Economics

3 Wang, Tangjia. 2014. Is Confucianism a Source of Corruption in Chinese Society? A New  
4 Round of Debate in Mainland China. Dao

5 Wang, V. & L. Rakner. 2005. The Accountability Function of Supreme Audit Institutions in  
6 Malawi, Uganda and Tanzania. U4 Report 2005:4 (Bergen: CMI).

7 Wang, Yuhua. 2014. Institutions and Bribery in an Authoritarian State. Studies in  
8 Comparative International Development

9 Wangnerud, Lena. 2010. Variation in Corruption between Mexican States: Elaborating the  
10 Gender Perspective.

11 Wangnerud, Lena. 2012. "Why Women Are Less Corrupt Than Men", in Soren Holmberg &  
12 Bo Rothstein eds., Good Government: The Relevance of Political Science .

13 Wangnerud, Lena. 2015. "Gender and Corruption" , in Paul M. Heywood ed., The  
14 Routledge Handbook of Political Corruption (New York: Routledge)

15 Wank, David L. "Bureaucratic Patronage and Private Business: Changing Networks of  
16 Power in Urban China", in Andrew G. Walder ed., The Waning of the Communist State (Berkeley:  
17 University of California Press)

18 Wank, David L. 2002. Evolving Business-State Clientalism in China: The Institutional  
19 Organization of a Smuggling Operation. Working paper.

20 Wanlin, Lori Ann. The Gap Between Promise and Practice in the Global Fight Against  
21 Corruption. Asper Review of International Business & Trade Law.

22 Wantchekon, Leondard. 2003. Clientalism and Voting Behavior: Evidence from a Field  
23 experiment in Benin. World Politics

24 Warburton, John. 2001. "Corruption as a Social Process: From Dyads to Networks," in  
25 Corruption and Anti-Corruption (Peter Lamour & Nick Wolanin, eds.)

26 Ward, H. & H. Dorussen. 2015. Public Information and Performance: The Role of Spatial  
27 Dependence in the Worldwide Governance Indicators Among African Countries. World  
28 Development.

Ware, Glenn T., Shaun Moss, J. Edgardo Campos & Gregory P. Noone, "Corruption in  
Procurement", in Adam Graycar & Russell G. Smith eds., Handbook of Global Research and  
Practice in Corruption

Warin, F. Joseph & Andrew S. Boutros. 2007. Deferred Prosecution Agreements: A View  
from the Trenches and a Proposal for Reform. Virginia Law Review In Brief

Warin, F. Joseph, Charles Falconer & Michael S. Diamant. 2010. The British Are Coming!:



1 Britain Changes Its Law on Foreign Bribery and Joins the International Fight Against Corruption.  
2 Texas International Law Journal

3 Warin, F. Joseph, Michael S. Diamant & Jill M. Pfenning. 2010. FCPA Compliance in  
4 China and the Gifts and Hospitality Challenge. Virginia Law & Business Review

5 Warin, F. Joseph, Michael S. Diamant & Veronica S. Root. 2011. Somebody's Watching  
6 Me: FCPA Monitorships and How They Can Work Better. University of Pennsylvania Journal of  
7 Business Law

8 Warner, Carolyn M. 2015. "Sources of Corruption in the European Union", in Paul M.

9 Heywood ed., The Routledge Handbook of Political Corruption (New York: Routledge)

10 Warner, Carolyn. 2007. "Globalisation and Corruption", in G. Ritzer ed., The Blackwell  
11 Companion to Globalisation. London: Blackwell.

12 Warren, M. 2004. "Social Capital and Corruption", in D. Castiglione ed., Social Capital:  
13 Interdisciplinary Perspectives. (Oxford: Oxford University Press)

14 Warren, Mark E. 2004. What does Corruption Mean in a Democracy? American Journal of  
15 Political Science

16 Warren, Mark E. 2006. Democracy and Deceit: Regulating Appearances of Corruption.  
17 American Journal of Political Science

18 Warren, Mark E. 2015. "The Meaning of Corruption in Democracies", in Paul M.

19 Heywood ed., The Routledge Handbook of Political Corruption (New York: Routledge).

20 Watts, P. 2014. Corrupt Company Controllers, Their Companies and Their Companies'  
21 Creditors: Dealing with Pleas of Ex Turpi Causa. Journal of Business Law

22 Wayne, S. & R. Taagepera. 2005. Corruption, Culture and Communism. International  
23 Review of Sociology

24 Weaver, G.R. & L.K. Trevino. 1999. Compliance and Values Oriented Ethics Programs:  
25 Influences on Employees' Attitudes and Behavior. Business Ethics Quarterly

26 Weaver, G.R. 2001. Ethics Programs in Global Business: Culture's Role in Managing  
27 Ethics. Journal of Business Ethics

28 Weaver, G.R. 2006. Virtue in Organizations: Moral Identity as a Foundation for Moral  
Agency. Organization Studies

Weaver, G.R., L.K. Trevino & P.L. Cochran. 1999. Corporate Ethics Programs as Control  
Systems: Influences of Executive Commitment and Environmental Factors. Academy of  
Management Journal



Pg 1783 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Weaver, G.R., L.K. Trevino & P.L. Cochran. 1999. Integrated and Decoupled Corporate  
2 Social Performance: Management Values, External Pressures, and Corporate Ethics Practices.  
Academy of Management Journal
- 3 Webb, Philippa. 2005. The United Nations Convention Against Corruption: Global  
4 Achievement or Missed Opportunity? Journal of International Economic Law
- 5 Weber Abramo, Claudio. 2008. How Much Do Perceptions of Corruption Really Tell Us?  
6 Economics – The Open-Access, Open Assessment E-Journal
- 7 Weber, J. & K.A. Getz. 2004. Buy Bribes or Bye-Bye Bribes: The Future Status of Bribery  
8 in International Commerce. Business Ethics Quarterly
- 9 Weber, J. 2015. Investigating and Assessing the Quality of Employee Ethics Training  
10 Programs Among US-Based Global Organizations. Journal of Business Ethics
- 11 Webster, Mary Evans. 2008. Fifteen Minutes of Shame: The Growing Notoriety of Grand  
12 Corruption. Hastings International & Comparative Law Quarterly
- 13 Wedel, J. 2015. High Priests and the Gospel of Anti-Corruption. Challenge
- 14 Wedel, Janine R. 2001. Corruption and Organized Crime in Post-Communist States: New  
15 Ways of Manifesting Old Patterns. Trends in Organized Crime
- 16 Wedel, Janine R. 2012. Rethinking Corruption in an Age of Ambiguity. Annual Review of  
17 Law & Social Science
- 18 Wedeman, Andrew. 1997. “Looters, Rent-Scrapers, and Dividend Collectors: The Political  
19 Economy of Corruption in Zaire, South Korea, and the Philippines,” Journal of Developing Areas,
- 20 Wedeman, Andrew. 2002. “Development and Corruption: The East Asian Paradox,” in E.T.  
21 Gomez, ed. Political Business in East Asia (Routledge)
- 22 Wedeman, Andrew. 2002. “State Predation and Rapid Growth: The Polarisation of Business  
23 in China,” in E.T. Gomez, ed. Political Business in East Asia (Routledge)
- 24 Wedeman, Andrew. 2004. The Intensification of Corruption in China. China Quarterly
- 25 Wedeman, Andrew. 2009. “China’s War on Corruption”, in Gong, T. & S.K. Ma eds.,  
26 Preventing Corruption in Asia: Institutional Design and Policy Capacity (London: Routledge),
- 27 Weeks, Joseph R. 1986. Bribes, Gratuities and the Congress: The Institutionalized  
28 Corruption of the Political Process, the Impotence of the Criminal Law to Reach It, and a Proposal  
for Change. Journal on Legislation
- Weghorst, Keith R. & Staffan I. Lindberg. 2011. Effective Opposition Strategies: Collective  
Goods or Clientalism? Democratization
- Wei, Shang-Jin & Yi Wu. 2002. Negative Alchemy? Corruption, Composition of Capital

Pg 1784 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Flows, and Currency Crises, in Sebastian Edwards & Jeffrey Frankel, eds. Preventing Currency Crises in Emerging Markets (Chicago: University of Chicago Press)

Wei, Shang-Jin. 2000. How Taxing is Corruption on International Investors? Review of Economics & Statistics.

Wei, Shang-Jin. 2000. Local Corruption and Global Capital Flows. Brookings Papers on Economic Activity

Wei, Shang-Jin. 2000. Natural Openness and Good Government. NBER Working Paper No. 7765.

Wei, Shang-Jin. 2001. Corruption in Economic Development: Grease or Sand?, in Economic Survey of Europe No. 2 (United Nations Economic Commission for Europe, Geneva)

Wei, Shang-Jin. 2001. does Corruption Provide Relief on Tax and Capital Control for International Investors?, in James R. Hines, Jr., ed. International Taxation and Multinational Activity (Chicago: University of Chicago Press)

Wei, Shang-Jin. 2001. Domestic Crony Capitalism and International Fickle Capital: Is There a Connection? International Finance

Weinograd, Charles B. 2010. Clarifying Grease: Mitigating the Threat of Overdeterrence by Defining the Scope of the Routine Government Action Exception. Virginia Journal of International Law

Weintraub, Ellen L. 2004. Perspectives on Corruption. Election Law Journal

Weisel, Ori & Shaul Shalvi. 2015. The Collaborative Roots of Corruption. Proceedings of the National Academy of Sciences of the United States of America

Weiser, Stuart Marc. 1997. Dealing with Corruption: Effectiveness of Existing Regimes on Doing Business. American Society of International Law Proceedings

Weismann, Miriam F. 2009. The Foreign Corrupt Practices Act: The Failure of the Self-Regulatory Model of Corporate Governance in the Global Business Environment. Journal of Business Ethics

Weismann, Miriam F., Christopher A. Buscaglia & Jason Peterson. 2014. The Foreign Corrupt Practices Act: Why It Fails to Deter Bribery as a Global Market Entry Strategy. Journal of Business Ethics

Weiss, David C. 2009. The Foreign Corrupt Practices Act, SEC Disgorgement of Profits, and the Evolving International Bribery Regime: Weighing Proportionality, Retribution, and Deterrence. Michigan Journal of International Law

Weissman, Andrew & Alixandra Smith. 2010. Restoring Balance: Proposed Amendments to the Foreign Corrupt Practices Act (Washington, D.C.: U.S. Chamber Institute for Legal Reform).

Pg 1785 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Weitz, Justin. 2011. The Devil Is in the Details: 18 U.S.C. § 666 After Skilling v. United  
2 States. NYU Journal of Legislation and Public Policy 14: 805-.
- 3 Weitzel, Utz & Sjors Berns. 2006. Cross-Border Takeovers, Corruption, and Related  
4 Aspects of Governance. Journal of International Business Studies
- 5 Weitz-Shapiro, Rebecca & Matthew S. Winters. 2015. Can Citizens Discern? Information  
6 Credibility, Political Sophistication, and the Punishment of Corruption in Brazil.
- 7 Weitz-Shapiro, Rebecca. 2012. What Wins Votes: Why Some Politicians Opt Out of  
8 Clientalism. American Journal of Political Science
- 9 Welch, Susan & John R. Hibbing. 1997. The Effects of Charges of Corruption on Voting  
10 Behavior in Congressional Elections, 1982-1990, The Journal of Politics
- 11 Wells, Jill. 2013. "Corruption and Collusion in Construction: A View from the Industry", in  
12 Soreide, Tina & Aled Willams eds., Corruption, Grabbing and Development .
- 13 Welsch, Heinz. 2004. Corruption, Growth and the Environment: A Cross-Country Analysis.  
14 Environment & Development Economics
- 15 Welsch, Heinz. 2008. The Welfare Costs of Corruption. Applied Economics
- 16 Wen, Shuangge. 2013. The Achilles Heel that Hobbles the Asian Giant: The Legal and  
17 Cultural Impediments to Antibribery Initiatives in China. American Business Law Journa
- 18 Weng, W.W., C.K. Woo, Y.S. Cheng, T. Ho & I. Horowitz. 2015. Public Trust and  
19 Corruption Perception: Disaster Relief. Applied Economics
- 20 Werb, D., K.D. Wagner, L. Beletsky, P. Gonzalez-Zuniga, G. Rangel & S.A. Strathdee.  
21 2015. Police Bribery and Access to Methadone Maintenance Therapy within the Context of  
22 Drug Policy Reform in Tijuana, Mexico. Drug & Alcohol Dependence
- 23 Werlin, Herbert H. 1994. Revisiting Corruption with a New Definition. International Review  
24 of Administrative Sciences .
- 25 Werlin, Herbert H. 2002. Secondary Corruption: The Concept of Political Illness. Journal of  
26 Social, Political & Economic Studies
- 27 Werlin, Herbert. 2013. Understanding International Corruption and What to Do About It.  
28 Challenge
- Werner, C. 2000. Gifts, Bribes, and Development in Post-Soviet Kazakhstan. Human  
Organization .
- Wesberry, James P., Jr. 1998. International Financial Institutions Face the Corruption  
Eruption: If the IFIs Put Their Muscle and Money Where Their Mouth Is, the Corruption  
Eruption May Be Capped. Northwestern Journal of International Law & Business

1 Wescott, C. 2001. E-Government in the Asia-Pacific Region. Asia Journal of Political  
2 Science

3 Wescott, Clay G. 2003. E-Government to Combat Corruption in the Asia Pacific Region.

4  
5 Westbrook, Amy Deen. 2010. Enthusiastic Enforcement, Informal Legislation: The Unruly  
6 expansion of the Foreign Corrupt Practices Act. Georgia Law Review

7 Westbrook, Amy Deen. 2012. Double Trouble: Collateral Shareholder Litigation Following  
8 Foreign Corrupt Practices Act Investigations. Ohio State Law Journal

9 Wetter, J. Giles. 1994. Issues of Corruption before International Arbitral Tribunals: The  
10 Authentic Text and True Meaning of Judge Gunnar Lagergren's 1963 Award in ICC Case No.  
11 1110. Arbitration International

12 Weyland, Kurt. 1998. The Politics of Corruption in Contemporary Latin America. Journal of  
13 Democracy

14 Wheeler, D. & A. Mody. 1992. International Investment Location Decisions: The Case of  
15 U.S. Firms. Journal of International Economics

16 Whitaker Charles N. 1992. Federal Prosecution of State and Local Bribery: Inappropriate  
17 Tools and the Need for a Structured Approach. Virginia Law Review

18 White, Andrew. 2006. The Paradox of Corruption as Antithesis to Economic Development:  
19 does Corruption Undermine Economic Development in China and Indonesia and Why Are the  
20 experiences Different in Each Country? Asian-Pacific Law & Policy Journal 8: 1-.

21 White, Brent T. 2009. Rotten to the Core: Project Capture and the Failure of Judicial Reform  
22 in Mongolia. East Asia Law Review

23 White, Brent T. 2010. Putting Aside the Rule of Law Myth: Corruption and the Case for  
24 Juries in Emerging Democracies. Cornell International Law Journal

25 White, Simone. 2014. "Footprints in the Sand: Regulating Conflict of Interest at EU Level",  
26 in Jean-Bernard Auby, Emmanuel Breen & Thomas Perroud eds., Corruption and Conflicts of  
27 Interest: A Comparative Law Approach

28 Widmalm, Sten. 2005. explaining Corruption at the Village and Individual Level in India:  
Findings from a Study of the Panchayati Raj Reforms. Asian Survey

Widmalm, Sten. 2008. Decentralisation, Corruption, and Social Capital—From India to the  
West (Los Angeles: Sage Publications).

Widoyoko, D. 2007. Tackling Corruption to Improve Housing Services in Indonesia  
(Washington, D.C.: World Bank).

Pg 1787 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

Wieneke, A. & T. Gries. 2011. SME Performance in Transition Economies: The Financial Regulation and Firm-Level Corruption Nexus. *Journal of Comparative Economics* 39: 221-229.

Wiens, David. 2013. Natural Resources and Institutional Development. *Journal of Theoretical Politics*.

Wigley, Simon. 2003. Parliamentary Immunity: Protecting Democracy or Protecting Corruption? *Journal of Political Philosophy*.

Wilhelm, Paul G. 2002. International Validation of the Corruption Perceptions Index. *Journal of Business Ethics*.

Wilkinson, P. 2006. "Reporting on Countering Corruption", in B. Errath ed., *Business Against Corruption: Case Stories and Examples* (New York: United Nations Global Compact Office)

Williams Robert, ed. 2000. *Party Finance and Political Corruption*. New York: St. Martin's Press.

Williams, A. Rebecca. 2015. An Inside Job: Using In-Court Sting Operations to Uncover Corruption in an Inadequate Self-Regulating System. *Georgetown Journal of Legal Ethics*

Williams, Andrew & Abu Siddique. 2008. The Use (and Abuse) of Governance Indicators in Economics: A Review. *Economics of Governance* .

Williams, Andrew. 2009. On the Release of Information by Governments: Causes and Consequences. *Journal of Development Economics*

Williams, Andrew. 2011. Shining a Light on the Resource Curse: An Empirical Analysis of the Relationship Between Natural Resources, Transparency, and Economic Growth. *World Development*

Williams, C.C. 2015. Evaluating Cross-National Variations in Envelope Wage Payments in East-Central Europe. *Economic & Industrial Democracy*

Williams, C.C. 2015. explaining Cross-National Variations in the Informalisation of Employment: Some Lessons from Central and Eastern Europe. *European Societies*.

Williams, C.C. 2015. Tackling Informal Employment in Developing and Transition Economies: A Critical Evaluation of the Neo-Liberal Approach. *International Journal of Business & Globalisation*

Williams, Gregory Howard. 1990. Good Government by Prosecutorial Decree: The Use and Abuse of Mail Fraud. *Arizona Law Review*

Williams, H. 2002. Core Factors of Police Corruption Across the World. *Forum on Crime & Society*

Williams, J.W. & M.E. Beare. 1999. The Business of Bribery: Globalization, Economic

1 Liberalization, and the “Problem” of Corruption. Crime, Law & Social Change

2 Williams, Robert & Alan Doig. 2004. A Good Idea Gone Wrong? Anti-Corruption  
3 Commissions in the Twenty-First Century. Bergen: The Christian Michelsen Institute.

4 Williams, Robert. 1999. New Concepts for Old? Third World Quarterly.

5 Williams, Robert. 2000. Party Finance and Political Corruption (MacMillan).

6 Williams, Sope. 2007. The Debarment of Corrupt Contractors from World Bank-Financed  
7 Contracts. Public Contract Law Journal

8 Wilsher, D. 2006. inexplicable Wealth and Illicit Enrichment of Public Officials: A Model  
9 Draft that Respects Human Rights in Corruption Cases. Crime, Law & Social Change

10 Wilson, Bruce M. 2014. Costa Rica’s Anti-Corruption Trajectory: Strengths and  
11 Limitations.

12 Wilson, John K. & Richard Damania. 2005. Corruption, Political Competition and  
13 Environmental Policy. Journal of Environmental Economics & Management

14 Wilson, Natasha N. 2014. Pushing the Limits of Jurisdiction Over Foreign Actors Under the  
15 Foreign Corrupt Practices Act. Washington University Law Review

16 Wiltermuth, Scott S. 2011. Cheating More when the Spoils Are Split. Organizational  
17 Behavior & Human Decision Processes

18 Windsor, Duane & Kathleen A. Getz. 2000. Multilateral Cooperation to Combat Corruption:  
19 Normative Regimes Despite Mixed Motives and Diverse Values. Cornell International Law Journal

20 Wines, W. & N. Napier. 1992. Toward an Understanding of Cross-Cultural Ethics: A  
21 Tentative Model. Journal of Business Ethics

22 Winters, Jeffrey A. 2002. “Criminal Debt”, in Jonathan R. Pincus & Jeffrey A. Winters eds.,  
23 Reinventing the World Bank.

24 Winters, L.A. 2004. Trade Liberalisation and Economic Performance: An Overview.  
25 Economic Journal .

26 Winters, M.S. & G. Martinez. 2015. The Role of Governance in Determining Foreign Aid  
27 Flow Composition. World Development

28 Winters, Matthew S. & Rebecca Weitz-Shapiro. 2013. Lacking Information or Condoning  
Corruption? When Will Voters Support Corrupt Politicians? Comparative Politics

Winters, Matthew S. & Rebecca Weitz-Shapiro. 2015. Political Corruption and Partisan  
Engagement: Evidence from Brazil. Journal of Politics in Latin America

Winters, Matthew S. & Rebecca Weitz-Shapiro. 2015. Who’s in Charge here? Voter

Punishment of Municipal Corruption.

Winters, Matthew S. 2010. Choosing to Target: What Types of Countries Get Different Types of World Bank Projects. World Politics

Winters, Matthew S. 2014. Targeting, Accountability and Capture in Development Projects. International Studies Quarterly .

Wirl, Franz. 1998. Socio-Economic Typologies of Bureaucratic Corruption and Implications. Journal of Evolutionary Economics 8: 199-220.

Witten, Roger M., Kimberly A. Parker, Jay Holtmeier & Thomas J. Koffer. 2009.

Prescriptions for Compliance with the Foreign Corrupt Practices Act: Identifying Bribery Risks and Implementing Anti-Bribery Controls in Pharmaceutical and Life Sciences Companies. Business Lawyer

Wolf, Sebastian. 2010. Assessing Eastern Europe's Anti-Corruption Performance: Views from the Council of Europe, OECD, and Transparency International. Global Crime

Wolfers, Justin. 2006. Point Shaving: Corruption in NCAA Basketballl. American Economic Review 96: 279-283.

Woodin, Christine M. 2012. A Solution to the Conflict over the Appropriate Unit of Prosecution for 18 USC § 666. University of Chicago Legal Forum

Woods, Neal D. 2008. The Policy Consequences of Political Corruption: Evidence from State Environmental Programs. Social Science Quarterly

World Bank, Energy, Transport & Water Department. 2009. Deterring Corruption and Improving Governance in the Electricity Sector (Washington, D.C.: World Bank).

World Bank, Independent Evaluation Group. 2008. Public Sector Reform: What Works and Why? An IEG Evaluation of World Bank Support. Washington, D.C.: World Bank.

World Bank, Independent Evaluation Group. 2011. A Review of World Bank Support for Accountability Institutions in the Context of Governance and Anticorruption.

World Bank. 1997. Helping Countries Combat Corruption: The Role of the World Bank.

World Bank. 2000. "Designing an Effective Anticorruption Strategy," in Anticorruption in Transition: A Contribution to the Policy Debate (Washington, D.C.: World Bank).

World Bank. 2010. Silent and Lethal: How Quiet Corruption Undermines Africa's Development Efforts (Washington, D.C.: World Bank).

World Bank. 2011 . Curbing Fraud, Corruption, and Collusion in the Roads Sector. (Washington, D.C.: World Bank).



Pg 1790 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

World Bank. 2012. Fighting Corruption in Public Services: Chronicling Georgia’s Reforms. Washington, D.C.: World Bank.

Worthy, Ben & Tom McClean. 2015. “Freedom of Information and Corruption” , in Paul M. Heywood ed., The Routledge Handbook of Political Corruption (New York: Routledge)

Wouters, Jan, Cedric Ryngaert & Ann Sofie Cloots. 2013. The International Legal Framework against Corruption. Melbourne Journal of International Law

Wrage, Alexandra & Kerry Mandernach. 2006. “Facilitation Payments”, in B. Errath ed., Business Against Corruption: Case Stories and Examples (New York: United Nations Global Compact Office)

Wrage, Alexandra Addison. 2007. Bribery and Extortion.

Wren-Lewis, L. 2015. Do Infrastructure Reforms Reduce the Effect of Corruption? Theory and Evidence form Latin America and the Caribbean. World Bank Economic Review

Wren-Lewis, Liam. 2013. “Anti-Corruption Policy in Regulation and Procurement: The Role of International Actors”, in Susan Rose-Ackerman & Paul D. Carrington eds., Anti-Corruption Policy: Can International Actors Play a Constructive Role? (Durham: Carolina Academic Press)

Wright, B. 2010. Civilianising the ‘Blue Code’? An Examination of Attitudes to Misconduct in the Police Extended Family. International Journal of Police Science & Management.

Wright, G. & J. Czelusta. 2004. Why Economies Slow: The Myth of the Resource Curse. Challenge

Wrong, Michela. 2009. It’s Our Turn to Eat: The Story of a Kenyan Whistle-Blower.

Wrong, Michela. 2013. “How International Actors Can Help the Media in Developing Countries Play a Stronger Role in Combating Corruption”, in Susan Rose-Ackerman & Paul D. Carrington eds., Anti-Corruption Policy: Can International Actors Play a Constructive Role? (Durham: Carolina Academic Press)

Wu, S.-Y.. 2006. Corruption and Cross-Border Investment by Multinational Firms. Journal of Comparative Economics

Wu, Xun. 2005. Corporate Governance and Corruption: A Cross-Country Analysis. Governance

Wu, Z.Y., J.C. Wu, S.C. Lin & C. Wang. 2014. An Electronic Voting Mechanism for Fighting Bribery and Coercion. Journal of Southeast Asian Studies

Wyatt, G. 2003. Corruption, Productivity, and Socialism. Kyklos .

Xin, Xiaohui & Thomas K. Rudel. 2004. The Context for Political Corruption: A Cross-National Analysis. Social Science Quarterly



- 1 Yackee, Jason Webb. 2012. Investment Treaties and Investor Corruption: An Emergent  
2 Defense for Host States? Virginia Journal of International Law
- 3 Yamamura, E. 2014. Corruption and Perceived Risk: A Case of the 2011 Fukushima  
4 Disaster. International Journal of Social Economics
- 5 Yamamura, Eiji 2014. Impact of Natural Disaster on Public Sector Corruption. Public  
6 Choice
- 7 Yan, J. & T.H. Oum. 2014. The Effect of Government Corruption on the Efficiency of US  
8 Commercial Airports. Journal of Urban Economics
- 9 Yan, Zhang & Yang Liu. 2016. The Competing Media Frame Study in One Country of Two  
10 Systems: The Case Study on Scandal of Chen Liangyu. International Journal of Social Science &  
11 Humanities
- 12 Yang, Dean. 2008. Can Enforcement Backfire? Crime Displacement in the Context of  
13 Customs Reform in the Philippines. Review of Economics & Statistics
- 14 Yang, Dean. 2008. Integrity for Hire: An Analysis of a Widespread Customs Reform.  
15 Journal of Law & Economics
- 16 Yanva, Vineeta. 2011. Political Parties, Business Groups, and Corruption in Developing  
17 Countries. Oxford University Press.
- 18 Yao, Shuntian. 2002. Privileges and Corruption: The Problems of China's Socialist Market  
19 Economy. American Journal of Economics and Sociology
- 20 Yap, O. Fiona. 2013. When Do Citizens Demand Punishment of Corruption? Results from  
21 experimental Surveys in Australia and the United States. Australian Journal of Political Science
- 22 Yap, O. Fiona. 2014. Citizens' Response to Government Corruption: experimental Evidence  
23 from Australia, Singapore, and the United States. Working paper.
- 24 Yavas, Cemile. 1998. A Comment on "Corruption by Design". Journal of Law, Economics  
25 & Organization
- 26 Yavas, Cemile. 2009. The Ghost of Corruption. B.E. Journal of Economic Analysis &  
27 Policy 7.
- 28 Yilmaz, G. & D. Soyaltin. 2014. Zooming into the "Domestic" in Europeanization:  
Promotion of Fight Against Corruption and Minority Rights in Turkey. Journal of Balkan & Near  
Eastern Studies
- Yingling, M. Patrick & Mohamed A. Arafa. 2013. After the Revolution: Egypt's Changing  
Forms of Corruption. University of Baltimore Journal of International Law
- Yockey, Joseph W. 2011. Solicitation, Extortion, and the FCPA. Notre Dame Law Review

Pg 1792 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1 Yockey, Joseph W. 2012. FCPA Settlement, Internal Strife, and the “Culture of  
Compliance” Wisconsin Law Review
- 2 Yockey, Joseph W. 2013. Choosing Governance in the FCPA Reform Debate. Journal of  
3 Corporation Law
- 4 Yolles, Maurice & Gerhard Fink. 2014. Personality, Pathology and Mindsets: Part 3 –  
5 Pathologies and Corruption. Kybernetes 4
- 6 Yong Hyo, C. & C. Byung-Dae. 2004. E-Government to Combat Corruption: The Case of  
Seoul Metropolitan Government. International Journal of Public Administration
- 7 Yoo, Seung Han. 2008. Petty Corruption. Economic Theory
- 8 Yoo, Seung Han. 2013. Competition, Corruption, and Institutional Design. Working paper.
- 9 You, Jong-Sung & Sanjeev Khagram. 2005. A Comparative Study of Inequality and  
10 Corruption. American Sociological Review.
- 11 Young, Nicola Man W., H. Worth., A. Kelly, D.P. Wilson & P. Siba. 2014. Is Endemic  
12 Political Corruption Hampering Provision of ART and PMTCT in Developing Countries? Journal  
13 of the International AIDS Society
- 14 Young, Simon N.M. 2009. Why Civil Actions Against Corruption? Journal of Financial  
15 Crime
- 16 Yu, Chilik, Chun-Ming Chen, Lung-Teng Hu & Wen-Jong Juang. 2009. “Evolving  
17 Perceptions of Government Integrity and Changing Anticorruption Measures in Taiwan”, in Gong,  
T. & S.K. Ma eds., Preventing Corruption in Asia: Institutional Design and Policy Capacity  
(London: Routledge),
- 18 Yukins, Christopher R. 2007. Integrating Integrity and Procurement: The United Nations  
19 Convention Against Corruption and the UNCITRAL Model Procurement Law. Public Contract Law  
20 Journal
- 21 Yusuf, M., C.A. Malarvizhi, M.N. Huda Mazumder & Z. Su. 2014. Corruption, Poverty, and  
22 Economic Growth Relationship in the Nigerian Economy. Journal of Developing Areas
- 23 Zabyelina, Y. & J. Arsovska. 2013. Rediscovering Corruption’s Other Side: Bribing for  
Peace in Post-conflict Kosovo and Chechnya. Crime, Law & Social Change
- 24 Zagainova, Anastassiya. 2007. “Challenges of Anti-Corruption Policies in Post-Communist  
25 Countries”, in Sarah Bracking ed., Corruption and Development: The Anti-Corruption Campaigns  
(Palgrave Macmillan)
- 26 Zagaris, Bruce & Shaila Lakhani Ohri. 1999. The Emergence of an International  
27 Enforcement Regime on Transnational Corruption in the Americas. Law & Policy Int’l Bus.
- 28 Zaloznaya, M. 2015. does Authoritarianism Breed Corruption? Reconsidering the

Relationship Between Authoritarian Governance and Corrupt Exchanges in Bureaucracies. Law & Social Inquiry

Zaloznaya, Marina. 2014. The Social Psychology of Corruption: Why It does Not Exist and Why It Should. Sociology Compass

Zaman, Asad & Faiz-Ur-Rahim. 2009. Corruption: Measuring the Unmeasurable. Humanomics

Zaman, G. & L. Ionescu. 2014. The Impact of International Economic Crises on Corruption in Romania. Economic Computation & Economic Cybernetics Studies & Research .

Zamboni, Yves & Stephan Litschig. 2014. Audit Risk and Rent Extraction: Evidence from a Randomized Evaluation in Brazil. Working paper.

Zaum, D. 2013. Political Economies of Corruption in Fragile and Conflict-Affected States: Nuancing the Picture. (Bergen: CMI).

Zazueta, Irvin Mikhail Soto & Willy W. Cortez. 2015. The Impact of Political Alternation on Corruption in Mexico. Revista de Ciencia Politica

Zerilli, Filippo M. 2005. "Corruption, Property Restitution and Romanianess", in Dieter Haller & Chris Shore eds., Corruption: Anthropological Perspectives (Pluto Press).

Zervos, Alexandros. 2006. Amending the Foreign Corrupt Practices Act: Repealing the Exemption for "Routine Government Action" Payments. Penn State International Law Review

Zeume, Stefan. 2014. Bribes and Firm Value. .

Zhang, T., F. Gino & M.H. Bazerman. 2014. Morality Rebooted: exploring Simple Fixes to Our Moral Bugs. Research in Organizational Behavior

Zhao, J., S. Kim & J. Du. 2003. The Impact of Corruption and Transparency on Foreign Direct Investment: An Empirical Analysis. Management International Review

Zhao, X. & H. Xu. 2015. E-Government and Corruption: A Longitudinal Analysis of Countries . International Journal of Public Administration

Zheng, Q., Y. Luo & S.L. Wang. 2013. Moral Degradation, Business Ethics, and Corporate Social Responsibility in a Transition Economy. Journal of Business Ethics (forthcoming).

Zhong, C.B., B. Strejcek & N. Sivanathan. 2010. A Clean Self Can Render Harsh Moral Judgment. Journal of experimental Social Psychology

Zhong, C.B., V.K. Bohns & F. Gino. 2010. Good Lamps Are the Best Police: Darkness Increases Dishonesty and Self-Interested Behavior. Psychological Science

Zhu, Boliang. 2009. Economic Integration and Corruption: The Case of China. Working paper.

1 Zhu, Boliang. 2016. MNCs, Rents and Corruption: Evidence from China. American Journal  
2 of Political Science (forthcoming).

3 Zhu, J.N. & Y.P. Wu. 2014. Who Pays More “Tributes” to the Government? Sectoral  
4 Corruption of China’s Private Enterprises. Crime, Law & Social Change 61(3): 309-333.

5 Zhuang, J., E. De Dios & A. Lagman-Martin. 2010. Governance and Institutional Quality  
6 and the Links with Economic Growth and Income Inequality: With Special Reference to  
Developing Asia. Asian Development Bank Economics Working Paper 193.

7 Zhuravskaya, Ekaterina. 2000. Incentives To Provide Local Public Goods: Fiscal  
8 Federalism, Russian Style. Journal of Public Economics

9 Ziblatt, Daniel. 2009. Shaping Democratic Practice and the Causes of Electoral Fraud:  
10 Theory and Evidence from Pre-1914 Germany. American Political Science Review

11 Zimmerman, Stephen S. & Frank A. Feriello, Jr. 2011. Coordinating the Fight against Fraud  
12 and Corruption, Agreement on Cross-Debarment among Multilateral Development Banks. World  
Bank Legal Review

13 Zimring, Franklin E. & David T. Johnson. 2009. On the Comparative Study of Corruption.  
14 Pacific McGeorge Global Business & Development Law Journal

15 Zinnbauer, Dieter. 2015. Crowdsourced Corruption Reporting: What Petrified Forests, Street  
16 Music, Bath Towels, and the Taxman Can Tell Us About the Prospects for Its Future. Policy &  
Internet

17 Ziobrowski, Alan J. et al. 2004. Abnormal Returns from the Common Stock Investments of  
18 Members of the United States Senate. Journal of Financial and Quantitative Analysis

19 Zipparo, L. 1998. Factors Which Deter Public Officials from Reporting Corruption. Crime,  
20 Law & Social Change

21 Zisser, Eyal. 2014. Spoils of Truce: Corruption and State-Building in Postwar Lebanon.  
Middle Eastern Studies

22 Zitzewitz, Eric. 2012. Forensic Economics. Journal of Economic Literature

23 Zitzewitz, Eric. 2014. does Transparency Reduce Favoritism and Corruption? Evidence  
24 from the Reform of Figure Skating Judging. Journal of Sports Economics

25 Zook, Darren C. 2009. The Curious Case of Finland’s Clean Politics. Journal of Democracy

26 Zou, Keyuan. 2000. Judicial Reform Versus Judicial Corruption: Recent Developments in  
27 China. Criminal Law Forum

28 Zouhaier, Hadhek. 2011. Corruption, Investment and Economic Growth. International  
Journal of Economics & Research

1 Zuber, F. 2015. Spread of Unethical Behavior in Organizations: A Dynamic Social Network  
2 Perspective. Journal of Business Ethics

3 Zuleta, J.C., A. Leyton & E. Fanta Ivanovic. 2007. "Combating Corruption in the Revenue  
4 Service: The Case of VAT Refunds in Bolivia", in J.E. Campos & S. Pradhan eds., The Many Faces  
of Corruption: Tracking Vulnerabilities at the Sector Level (Washington, D.C.: World Bank).

5 Zurowicki, Leon & Moshin Habib. 2010. Corruption and Foreign Direct Investment: What  
6 Have We Learned? International Business & Economics Research Journal

## EXHIBIT 74 - Acknowledgments & Additional Exhibits

**Witnesses, victims and informants are protected by:**

<https://www.sos.ca.gov/registries/safe-home/>; Public Domain use rights; Non-Commercial free information rights; Fair Use rights; Freedom of The Press; U.S. First Amendment; SLAPP; United Nations Human Rights Law - Per Amnesty International; GDPR; Privacy Tools At: <http://privacytools.io>; ACLU; ICIJ investigation group; State and Federal Constitutions; whistleblower laws and the digital “insurance files”.

ICIJ, ACLU, Transparency International, ProPublica, Reddit Users, Voat Users, Sunlight Foundation, Judicial Watch, Cause Of Action and hundreds of other organizations, and their members, have assisted in this investigation. Every member of the public is encouraged to learn forensic investigative techniques and technologies online and deeply monitor and investigate the suspects listed in this document.

Additional EXHIBITS, Numbers 2 through 18 are provided as additional PDF documents:

**EXHIBIT 75 – Timeline**

MASTER RESUME AND HISTORIC INVESTIGATIONS TIMELINE (In Near-Final Edit  
As Dates And Documents Are Being Cross-Checked) Rev. 2.6

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1968, forward -

\* Engineer, Designer - Reality Port(tm) absolute and synthetic electronic environment processor simulation system. US Patent and Trademarks filed. PRODUCER: THE FIRST VR GLASSES-FORMAT HEAD MOUNTED DISPLAY SOLD IN COMMERCE; PRODUCER AND PATENT AWARDEE: THE WORLD'S FIRST PATENTED, WORKING, HOLODECK/CAVE VR CHAMBER; PRODUCER: THE FIRST 360 DEGREE PC-BASED FLIGHT SIMULATOR & NATIONAL SPORTS STADIUM TOUR SHOWCASE; DEVELOPER: THE FIRST VRML VR SOFTWARE 3D WEB BROWSER; PRODUCER: FIRST FRESNEL VR LENS SOLD IN RETAIL MARKET; CREATOR OF THE CYBERCHAIR VR FURNITURE -VR and Experience Simulator Inventions By Scott D Redmond. Scott is the Developer, Patent Winner, Producer and Innovator for key VR, tactical and flight simulator industry "firsts" including the "Holodeck" (Also known as "The Cave") VR Chamber", VR Glasses wearables decades before Google Glass was even conceived of, CyberChair (used in the national Merrill Lynch TV commercial), the "First VRML" software and web browser under Windows, and Tactile VR Surfaces. Scott received significant media coverage about his many inventions in this field. He was featured on E! Entertainment Network for advising the Oliver Stone TV Series: "Wild Palms" and for building and receiving the first U.S. Federal patents on the first working VR Cave and VR Holodeck walk-in synthetic reality chambers as seen on major TV shows. His "Cyber-Pod" was the world's first 360

1 degree rotation, all-axis, spinning human gyro device for total VR immersion working in a public  
2 venue. It was also the first to be entirely PC powered and rendered. His devices are used globally in  
3 military, medical, CAD, entertainment and design fields. Scott also produced the first VR Bunji  
4 Jump experience where his team helicopter high-resolution photographed the Grand Canyon for a  
5 virtual Bunji Jump from the rim to the Colorado River below. His VR rides were experienced  
6 nationwide in major sports stadiums and other venues. Scott was a business partner with Silicon  
7 Graphics.

8  
9 =====

10  
11 1969, forward -

12  
13 \* Various Publications - Published Writer -

14 Author: Feature article series for Super-8 Filmmaker magazine. Author: Glitter City, script,  
15 a feature film musical. Cartoonist, Contributing Editor: The Reel Thing, a professional media  
16 journal. Contributing Writer: City paper, Baldwinsville, N.Y. Book reviews, cartoons, general  
17 interest stories. Background article briefing author for senior reporters.

18  
19 1969 -

20  
21 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
22 out the year for clients and employers.

23  
24 =====

25  
26  
27 Carjacked - A Bad Day -  
28



Pg 1799 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 While learning Banjo and Fiddle at The Music Farmers Music Farm in the Sierra Nevada  
2 Mountains, a crackhead jumped in the car Scott and his friend were in and stuck a pistol in Scott's  
3 ear. After a drive through the woods, Bill Hunter, the head of the Music Farm ended the situation  
4 with his Colt .45. Nobody died.

5 <https://www.facebook.com/groups/471672603848573/>

6 <https://www.legacy.com/us/obituaries/fresnobee/name/bill-hunter-obituary?id=6697876>

7 <https://www.wallfuneralhomes.com/obituary/bill-hunter>

8 [youtube.com/watch?v=2lWee\\_cWEgg](youtube.com/watch?v=2lWee_cWEgg)

9 <youtube.com/watch?v=40t9xIYEgUg>

10 <https://www.wallfuneralhomes.com/obituary/bill-hunter>

11  
12 =====

13  
14 1973 -

15  
16 \* - Research & Writing - Story Title: Writing Awards - 1973. Scott wins First AND Second  
17 place prize in regional law enforcement dissertation contest

18  
19 \* - Assistant Manager - McDonalds

20  
21 \* - Grocery Assistant Manager/Butcher

22  
23 \* - Nature center and public park coordinator

24  
25 \* - Graduated from Academy

26  
27 =====  
28

Pg 1800 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 1974 -

2

3 \* Producer, Animator: 3 minute, 16mm color animation, Joy, Funfilm, 1974.

4 \* Producer, Director: 5-1, 2 hour, 1/2 in. video tapes and 45 minute documentary for U.S.  
5 Forest Service, 1974.

6 \* Received criminal investigator credentials

7

8 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
9 out the year for clients and employers.

10

11 =====

12

13 1975 -

14

15 \* Engineer, Designer: Atmospheric color marking system, 1975.

16 \* Producer, Director: 12 minute, 16mm B&W short about children, Pressure Valve, 1975-  
17 1976.

18 \* Producer, Animator: 3 minute, 16mm color animation, The Finding, 1975.

19 \* Producer, Director: 1, 2 hour, 2 in. video documentary study of a unique man, Gabby,  
20 1975.

21 \* Assistant to Producer: Cowpens, a feature Bicentennial film project, through Cal State,  
22 Fresno, 1975.

23 \* Camera Operator: Comic dramatic short, Fresno, CA, 1975.

24

25 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
26 out the year for clients and employers.

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Pg 1801 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

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1976 -

\* Founder: Production Works, a non-profit design and developmeny community agency,  
1976.

\* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
out the year for clients and employers.

=====

1977 -

\* Founder - Clever Industries. Clever Industries Development Group. Clever Industries  
holding company founded

\* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
out the year for clients and employers.

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1977 -

\*World's Biggest Light Concert

LIGHTS - Lumiascape multi-million viewer event - 1977. Scott Douglas Redmond  
Produced a large number of major urban electro-optical programs for millions of live and webcast  
participants. These programs set many event and technical records for "firsts". Scott directed,  
designed, developed and engineered these presentations. His 'LUMIASCAPE' series of major public

Pg 1802 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

light-events set numerous records for "firsts" and scale-of-deployment. His light events included lasers, pyrotechnics and custom-built searchlight and xenon systems. "LIGHTS1" was, as far as anyone has seen, the first urban simulcast light concert viewed by over one million people. The City of San Francisco gave him total control of the entire mountain-top in the middle of San Francisco. The Mayor gave him a proclamation for the project. He received one of the first public laser licenses from the FDA and was the first person to ever write on the mountain, known as Twin Peaks, with a laser beam. He was the Laserist for the San Francisco Symphony Pops Concerts and was conducted by John Williams for the Star Wars concert. One New Year's eve he lit City Hall red (Another first-time-ever) and fired beam projectors from the apex. He was the first person to light Coit Tower with xenon searchlights. He produced the lighting of the Palace of Fine Arts that convinced the City of San Francisco to make the lighting a permanent feature of that historical architectural wonder. He provided solid lighting effects for a number of stage shows. His productions included: LIGHTS; The Royal Fireworks For Queen Elizabeth, The Palace Of Fine Arts Lighting; The Cow Palace Stage Extravaganza and more...

\* Scott works as Program Director, Inventor/Product Developer and Investigator throughout the year for clients and employers.

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1977 -

\* Engineer, Designer: 12,000 person computerized electronic environment, S F Civic Auditorium, 1977.

\* Engineer, Project Director: March of Dimes, 10,000 sq. ft. theatrical walkthrough, 1977.

\* Writer, Director, Cameraman: Missing Link, national sales TV spot, 1977.

\* Director of Photography: 15 minute, 16mm color pixillation, Producer, 1977.

Pg 1803 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

- 1           \* Production Assistant, Soundman: Directions, ABC-TV, 1977.
- 2           \* Producer, Director, Cameraman: 9 minute, 16mm color documentary, Waterflight, for
- 3 Lake Merritt Rowing Club, Oakland, CA, 1977.
- 4           \* Cameraman: Live action sequences, Mathematical Curves, produced by C. Watson, 1977.
- 5           \* Juror: National IFPA Cindy Awards, 1977.
- 6           \* Producer, Director: 60 sec. live action, animation spot, Sparkles, wraparound for national
- 7 syndication, 1977.
- 8           \* Producer, Director: 17 minute, 16mm color documentary, City Circus, about people of San
- 9 Francisco. Premiere at DeYoung Museum, San Francisco, 1977.
- 10          \* Scott Douglas Redmond delivered some of the first online digital social networks before
- 11 Facebook, Google, MySpace and other 2nd generation social networks even existed as companies.
- 12
- 13          \* Scott works as Program Director, Inventor/Product Developer and Investigator through-
- 14 out the year for clients and employers.
- 15
- 16          =====
- 17
- 18          1978 -
- 19
- 20          \* Production Coordinator: Documentary, Educational Film, The Superwalk, for the March
- 21 of Dimes, 1978.
- 22          \* Director, Special Effects, Costume Construction: Sci-fi TV spot for regional Chevrolet,
- 23 1978.
- 24          \* Engineer, Designer: Hyatt Regency, S F, 1978 - 1979.
- 25          \* Engineer: American Cloud, world's largest inflatable sculpture. San Francisco Symphony,
- 26 1978-1979.
- 27          \* Project Director: Series in association with the National Park Service, 1978-1979.
- 28          \* Engineer Designer: Lyons, 1978.

Pg 1804 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1           \* Designer, Pre-Production Director: Computerized feature film development package for  
2 independent producer, 1978.

3           \* Associate Producer, Engineer, Designer: S F Cow Palace, Massive computerized  
4 electronic interactive environment, 16,000 attendees, 1978.

5           \* Engineer, Designer: SOMA Event, San Francisco, 1978.

6           \* Co-Designer, Engineer: Claremont Hotel, Berkeley, 1978.

7           \* Engineer, Designer: Rancho Nicasio, Marin County, 1978.

8           \* Engineer, Project Director: ABC-TV Interactive electronic environment featuring earlier  
9 version of Reality Chamber(TM), 1978.

10          \* Engineer, Production Designer: Haight Neighborhood Assn., 1978.

11          \* Engineer, Designer: March of Dimes, 1978.

12          \* Promotion Director, Creative Director: Showplace Square, 1978.

13          \* Producer: Original musical, 1978.

14          \* Production Assistant: Rolling Stones Concert, Oakland Coliseum, 1978.

15          \* Production Associate: Greek Theater, Berkeley, 1978.

16          \* Production Associate: The Whole Earth Jamboree, GGNRA, 1978.

17          \* Project Director: Concert In The Park, Golden Gate Park, San Francisco. Summer, 1978.

18          \* Producer: Holiday Tours, San Francisco, 1978.

19          \* Engineer, Producer: Lights, the world's first and largest computerized interactive  
20 performance event, simulcast. Audience: 800,000+. Play-along system and full artistic and technical  
21 design. International media recognition. 1978.

22          \* Media Assistant: Tektite, underwater habitat, 1977-1978.

23  
24          \* Scott Douglas Redmond was Creative Director and Operations Lead on numerous large  
25 public promotions which delivered huge media coverage for his clients. He created and produced  
26 the world's largest balloon sculpture on top of the Hyatt Regency as a promotion for the San  
27 Francisco Symphony, called: "American Cloud". He wrapped a number of skyscrapers with massive  
28 ribbons and bows, or fabric sculptures, for building openings. He created an indoor snow storm

1 inside the Crocker Galleria with R2D2 as the Master of Ceremonies. He created the first through-  
2 the-roof opening effects for San Francisco Center and the historic Paramount Theater. He designed  
3 the dragon sculpture unit that wrapped around the central pillar in Union Square. The City Hall  
4 tribute to Charlotte Maillard was co-produced by Scott. Scott Produced the racing shoes and  
5 costume for Margie the elephant (who played the "Bantha" in Star Wars) to run in the Bay To  
6 Breakers race; The Congressmen Burton Memorial Statue event; The Battlestar Galactica premiere,  
7 The Showplace Square Galleria Musical with the stars of Beach Blanket Babylon event; The San  
8 Jose Earthquakes openers; AT&T events; The U.S. Post Office Golden Gate Bridge Anniversary  
9 Event and more. Scott Douglas Redmond was one of the promotional graphics coordinators for  
10 Olympic-type events, including the World Cycling events, and major media launches including the  
11 creation of novel new media technologies. He invented "Tentographics" tent art for the Genentech  
12 Gala and created and produced many large-scale graphics systems for massed audience visibility.  
13 Scott Douglas Redmond Provided The Special Effects For Grace Slick's Album Cover. Scott  
14 Douglas Redmond Produced One of Ray Charles Last Outdoor Concerts. It was presented for  
15 200,000+ live audience members in the San Francisco Polo Fields. Scott also Produced the  
16 Concerts-In-The-Park series in Golden Gate Park, Sutro Park, Union Square and public spaces  
17 around the Bay Area. Scott was mentored by Chet Helms, Don Wehr, David Robinson, Henry  
18 Dakin and other local impresarios. From Country Joe to Tower Of Power to The Flying  
19 Karamazov's...His events covered every musical interest. Scott was Chet Helms Exhibit Manager  
20 for the Monterey Tribal Stomp. He was production Designer for the Symphony At The Port event.

21  
22 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
23 out the year for clients and employers.

24  
25 \* 1978 - Undercover White-Collar Crime & Corruption Sting Operative

26  
27 =====  
28

Pg 1806 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1979 -

\* Project Director, Engineer: 20,000 person event. Raised \$200,000 for community groups.  
World's Record's set. Pier 2, San Francisco, 1979.

\* Production Manager: 10,000 person event, Pier 2, San Francisco, 1979.

\* Administrative Coordinator: Fort Mason Center, designed first major public use systems  
for National Park Service, 1979.

\* Project Consultant: Kezar Project, 1979.

\* Project Coordinator, Consultant: Coca Cola USA, 1979.

\* Project Coordinator: Fort Mason, Pier 2, San Francisco, 1979.

\* Associate Administrator: National Park Service, Crissy Field. San Francisco, 1979.

\* Project Director: National Park Service, Aquatic Park, San Francisco, 1979.

\* Engineer, Designer: Beams, a light performance. Coit Tower, San Francisco, 1979.

\* Visual Systems Engineer: The Passion of Dracula, On-Broadway Theater, San Francisco,  
1979.

\* Project Administrator: Basque Assn., Fort Mason, Pier 2, San Francisco, 1979.

\* Designer, Fabricator: Summer Jubilee, Napa, 1979.

\* Exhibits and Grounds Manger: Monterey Fairgrounds, California, 1979.

\* Engineer, Designer: World Premiere for Warner Bros. 1979.

\* Benefits Coordinator: European Fundraiser, Fort Mason, Pier 2, San Francisco, 1979.

\* Computer Lighting Manager: The Beaux Arts, San Francisco Civic Auditorium, 1979.

\* Lighting Director, Production Engineer: The Ball, San Francisco Civic Auditorium, 1979.

\* Production Supervisor: Fort Mason, Pier 3, San Francisco, 1979.

\* Engineer, Designer: The Hyatt Union Square, San Francisco, 1979.

\* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
out the year for clients and employers.



Pg 1807 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 =====

2

3 1980 -

4

5 \* Electric Car Development. Energy technology project. Scott coverts VW to electric car.

6

7 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
8 out the year for clients and employers.

9

10 =====

11

12 1980 -

13

14 \* Hostage - San Francisco Bank Of America. Scott is held hostage at San Francisco Bank of  
15 America armed robbery and assists police.

16

17 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
18 out the year for clients and employers.

19

20 =====

21

22 Scott - 1980

23

24 \* VR - AR - Simulator Inventor. Government Awarded Inventor Of VR Systems.

25

26 \* Mark Zuckerberg was pooping in his diapers and had no idea what 'VR' or 'Metaverse's'  
27 even meant. Meanwhile Scott was awarded many federal patents as inventor of VR and VR glasses.  
28 (FYI - Jaron only invented a glove).

Pg 1808 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1  
2 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
3 out the year for clients and employers.

4  
5 =====

6  
7 1980 -

8  
9 \* Engineer, Designer, Creative Direction: Phenomenon museum, Pier 39, San Francisco,  
10 1980.

11 \* Engineer, Designer, Fabricator: KYA, 1980.

12 \* Design Consultant: Christmas Light, effects display, San Francisco, 1980.

13 \* Engineer, Designer: Live Billboard radio promotion, KYA, 1980.

14  
15 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
16 out the year for clients and employers.

17  
18 =====

19  
20 1981 -

21  
22 \* BTB Footstock Mega- Concert Festival Event -Ray Charles, Tower Of Power and 2.5  
23 million square foot venue.Scott Douglas Redmond was the Founding Producer For The Bay To  
24 Breaker Footstock festivals and concerts. Footstock was a 200,000+ person rapid-built city, concert  
25 and public event like Woodstock. Scott produced it for over a decade on 2.5 million square feet of  
26 space in San Francisco. Stage acts included: Ray Charles (in his last outdoor super concert), Tower  
27 of Power, Robin Williams and more. Scott had to erect a portable city that had all of the resources  
28 for up to 200,000 people (Power, water, security, sanitation, staffing, operations, food & water

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1 distribution, promotional distribution, booth operations, staging, clean-up, structures, etc.) in 7 days,  
2 operate it for one day and then make it all disappear, like it was never there, in 48 hours. The entire  
3 race was "the largest race in the world" for a number of years. Scott Douglas Redmond produced  
4 one of Ray Charles Last Outdoor Concerts here. It was presented for 200,000+ live audience  
5 members in the San Francisco Polo Fields.

6  
7 1981 -

8  
9 \* Engineer, Designer: Giant Sculpture Logo, San Francisco, 1981.

10 \* Assistant Producer: Macy's Fashion Show Soundtracks, 1981.

11 \* Director: San Francisco Giants Opening Day, 1981.

12 \* Lighting Director: Missoni, University Art Museum, Berkeley, 1981.

13 \* Effects Engineer, Designer: Ghiradelli Square, San Francisco, 1981.

14 \* Engineer, Designer, Fabricator: Bay to Breakers Birthday Party. SP-FX, Union Square,  
15 San Francisco, 1981.

16 \* Designer, Lighting, Effects Director: San Mateo County Fairgrounds, 1981.

17 \* Engineer, Designer, Creator: Computerized Mountain Spectacular, promotion using ski  
18 resort slopes as world's largest projection screen, 1981.

19 \* Engineer, Designer: Christmas event, Serramonte Center, 1981.

20 \* Effects Director: Carlos Santana photo session, 1981.

21 \* Engineer, Designer, Fabricator: Holiday Inn, 1981.

22 \* Engineer, Fabrication : The Club, New Year's Eve, 1981.

23  
24 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
25 out the year for clients and employers.

26  
27 =====  
28

Pg 1810 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1982 -

\* Graphics Consultant: United States Army, Presidio, 1982-1983.

\* Engineer, Designer: Interior Design Convention, San Francisco, 1982.

\* Project Director: 25th Anniversary opening day. Candlestick Park, San Francisco, 1982.

\* Production Manager: Urban completion event, San Francisco, 1982.

\* Engineer, Laserist: Palo Alto Medical Center, computerized display, 1982.

\* Engineer, Laserist, Special Effects Producer: San Francisco Symphony, including Star Wars concert with John Williams, R2-D2, computerized lasers and visual effects, 1982.

\* Engineer, Designer: San Francisco, 1982.

\* Engineer, Director: Oakland Coliseum, show design, 1982.

\* Engineer, Director, Designer: Tiburon Harbor, 1982.

\* Technical Manager: Opera Plaza, 1982.

\* Project Director, Designer: Macy's, 1982.

\* Engineer, Lighting Coordinator: Computerized lighting, Galleria, 1982.

\* Engineer: Opening, San Francisco Suites, 1982.

\* Project Director: Private visual display, Municipal Pier, San Francisco, 1982.

\* Scott works as Program Director, Inventor/Product Developer and Investigator throughout the year for clients and employers.

=====

1983 -

\* Engineer, Project Director: The visit of H.R.M. Queen Elizabeth and computerized layout of the Royal Display, 1983.

\* Engineer, Computer & Special Visual Consultant: The State Capital Independence Day

Pg 1811 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 Gala, Sacramento, 1983.

2 \* Decoration and Presentation Manager: Memorial services for Congressman Burton, Great  
3 Meadow, National Park Service, 1983.

4 \* Engineer: San Francisco Symphony Pops season, computerized environment, creative  
5 design, 1983.

6 \* Project Director, Production Manager: Planetree Health Center fundraiser, computerized  
7 management of 44 simultaneous interactive environments, The Great Gaming House, 1983.

8 \* Designer, Director of Promotional Rocketry: Original concept designer for SVC's world's  
9 first advertising satellite, \$10,000,000.00 budget, national administrative responsibilities, 1983.

10 \* Special Consultant: 1984 Olympics Ceremonies pre-planning, designed lightship system,  
11 1983.

12 \* Designer, Project Associate: Civic tribute, City Hall, 1983.

13  
14 \* Scott Douglas Redmond helped coordinate the conversion of Fort Mason Center from a  
15 WW2 dump to one of the leading public spaces in the nation. Scott's events broke attendance  
16 records, use statistics and "first-ever" records under Scott's producership. He ran operations for  
17 "THE WORLD'S LARGEST INDOOR GARAGE SALE", at Fort Mason, which broke attendance  
18 records and raised hundreds of thousands of dollars for charity in 48 hours. He ran support  
19 operations for the multi-million dollar Coca Cola "GREAT GET-TOGETHER" corporate super  
20 party, which also set records. Scott created the shuttle parking system between Fort Mason and the  
21 Presidio.

22  
23 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
24 out the year for clients and employers.

25  
26 =====

27  
28 1984 -

Pg 1812 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

\* Historical event. May 14, 1984. Zuck Is Born. Mark Zuckerberg is pooping in his diaper while Scott had already built and deployed social media networks and virtual reality glasses, Metaverses and other things that ole Zuck swiped (as proven in email leaks).

1984 -

\* Engineer, Designer: Music tribute effects show, 1984.

\* Producer: "Motivation" official theme song for the Examiner Bay To Breakers, 1984.

\* Engineer, Project Director: Sonoma ED computerized laser symphony light display, 1984.

\* Engineer, Designer: Western Electric, AT&T electronic theatrical environment. Promotional display, 1984.

\* Engineer, Project Director: Cathedral Hill, 1984.

\* Development Consultant: Statue of Liberty event, 1984.

\* Engineer, Project Director: Ramada Promotion, 1984.

\* Designer, Project Director: Signetics, 1984.

\* Designer: Playboy Enterprises. 1984.

\* Designer: Pactel, 1984.

\* Scott works as Program Director, Inventor/Product Developer and Investigator throughout the year for clients and employers.

=====

1985 -

\* Engineer, Project Director: United Bank, 1985.

\* Lighting Director, Designer: Palace of Fine Arts, 1985.

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1 \* Lighting Director, Designer: Engineers event, 1985.

2 \* Director of Visual Effects: San Francisco Fair, 1985.

3

4 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
5 out the year for clients and employers.

6

7 =====

8

9 1986 -

10

11 \* Designer, Project Director: 400' laser sculpture, Shaklee Bldg., 1986.

12 \* Engineer, Designer: Opening ceremonies, Marriott Corp., 1986.

13 \* Engineer, Project Director: Christmas Ceremonies, Crocker Galleria, 1986-1988.

14 \* Development, launch & public marketing of TechMate <sup>TM</sup>, One of the first-ever online  
15 social networks in 1986. Advertised in national newspapers. Confirmed by Secretary of State.

16 \* First online video broadcast consumer service in 1986 via TechMate<sup>TM</sup> (per State &  
17 Federal) filings

18

19 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
20 out the year for clients and employers.

21

22 \* FOUNDER: "CLICKMOVIE.COM" - THE FIRST GLOBAL WEB VIDEO-ON-  
23 DEMAND BROADCASTING SERVICE; FOUNDER: "THE TRAILER PARK" - THE FIRST  
24 ONLINE MOVIE TRAILER WEBSITE; FOUNDER: "PERSONAL PRODUCER" - THE FIRST  
25 ONLINE PUBLIC UPLOAD MOVIE WEBSITE BEFORE YOUTUBE EXISTED

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27 =====

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1987 -

\* Director OF Computer Visual Effects: Lake Tahoe Independence Day, 1987.

\* Visual Effects Consultant: Bay Bridge Anniversary Ceremonies, 1987.

\* Graphics Systems Consultant: World Cycling Championships, 1987.

\* Producer, Arranger: "Build" original contemporary pop song, 1987.

\* Designer: Union Square dragon sculpture, 1987.

\* Designer, Project Director: Genentech, 1987.

\* Designer, Director: Christmas light concert, 1987.

\* UNIFREE - Founded and created by Scott, is up and running on the internet. It does everything that Google/Alphabet did, years later after Larry and Sergey copied UNIFREE to form Google

\* California Secretary of State and other government records show that Scott's social network, which Zuckerberg and Yahoo copied verbatim, was up and running on March 1, 1987. -

FOUNDER: "TECHMATE" AND "UNIFREE" - THE FIRST WEB SOCIAL MEDIA NETWORKS

- Scott Douglas Redmond delivered some of the first online digital social network companies before Facebook, Google, MySpace and other 2nd generation social networks even existed as companies. The U.S. Patent office ruled that he had produced social media e-commerce decades before Mark Zuckerberg or Yahoo engineers had. State, Federal, City and County filings prove Scott's social media companies were first-on-the-web. Emails, contracts and NDA's further verify that fact.

\* Scott works as Program Director, Inventor/Product Developer and Investigator throughout the year for clients and employers.



Pg 1815 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

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2

3 1988 -

4

5 \* Effects Director: Grand Opening. SF Center, 1988.

6 \* Engineer, Effects Director: Christmas in San Jose, 1988.

7

8 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
9 out the year for clients and employers.

10

11 \* 1988 - Placed in top percentile in Federal Office Of Personal Management Criminal  
12 Investigator 1811-C national test

13

14 =====

15

16 1989 -

17

18 \* Engineer, Director, Founder: TVyou trademark video-telephone interactive network  
19 project, 1989.

20 \* Graphics Engineer: Sesame Street promotion, 1989.

21

22 \* August, 1989, SF Weekly Newspaper is running display ads for Scott's globally  
23 operational social network "TECHMATE", which Zuckerberg and Yahoo copied verbatim.  
24 TECHMATE did everything that Facebook does..EXCEPT SPY ON USERS AND RIG  
25 ELECTIONS, like Facebook does. Facebook did not even form until 2004, after Zuckerberg had  
26 been using TECHMATE. Yahoo signed an NDA with Scott. In a federal hearing, the United States  
27 Patent Office said that Scott HAD beat Zuckerberg and Yahoo to online commercial social  
28 networks but Facebook and Google staff members were working for, and inside of, the U.S. Patent

1 Office, at the highest levels, at this time, so they put a freeze on the issuance of Scott's social media  
2 patent.

3  
4 \* Director, Founder: Post-Earthquake Bay Area emergency call-in center, for County  
5 Health, operational within 24 hrs. of quake with no advance prep., supported 1.2 million person  
6 area. 1989. - Scott Douglas Redmond was tasked, by The City Of San Francisco, with building the  
7 post-quake trauma center within 24 hours of the primary shock of the Loma Prieta Earthquake. The  
8 1989 Loma Prieta earthquake occurred on California's Central Coast on October 17 at 5:04 p.m.  
9 local time. With an Mw magnitude of 6.9[10] and a maximum Modified Mercalli intensity of IX  
10 (Violent), the shock was responsible for 63 deaths and 3,757 injuries. Scott was required to "break  
11 in" to the closed KQED TV studios at midnight, with help from KQED engineers, activate the entire  
12 phone bank inside the studios and staff the phones with qualified counselors on an emergency basis.  
13 The Loma Prieta segment of the San Andreas Fault System had been relatively inactive since the  
14 1906 San Francisco earthquake (to the degree that it was designated a seismic gap) until two  
15 moderate foreshocks occurred in June 1988 and again in August 1989. Because it happened during  
16 a national live broadcast of the 1989 World Series, taking place between Bay Area teams San  
17 Francisco Giants and the Oakland Athletics, it is sometimes referred to as the "World Series  
18 earthquake". Rush-hour traffic on the Bay Area freeways was lighter than normal because the game,  
19 being played at Candlestick Park in San Francisco, was about to begin, and this may have prevented  
20 a larger loss of life, as several of the Bay Area's major transportation structures suffered  
21 catastrophic failures. The collapse of a section of the double-deck Nimitz Freeway in Oakland was  
22 the site of the largest number of casualties for the event. Scott has worked earthquake, tsunami,  
23 wild-fire and other rapid-deployment disasters. Scott created DEMOCRI-C, The world's first  
24 disaster and refugee recovery App. Steve Jobs helped get it online for the Japanese Tsunami.

25  
26 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
27 out the year for clients and employers.  
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1990 -

\* U.S. PATENT AWARD --- Virtual Reality invention patent. Federal patent awarded as first-to-invent. - PRODUCER: THE FIRST VR GLASSES-FORMAT HEAD MOUNTED DISPLAY SOLD IN COMMERCE; PRODUCER AND PATENT AWARDEE: THE WORLD'S FIRST PATENTED, WORKING, HOLODECK/CAVE VR CHAMBER; PRODUCER: THE FIRST 360 DEGREE PC-BASED FLIGHT SIMULATOR & NATIONAL SPORTS STADIUM TOUR SHOWCASE; DEVELOPER: THE FIRST VRML VR SOFTWARE 3D WEB BROWSER; PRODUCER: FIRST FRESNEL VR LENS SOLD IN RETAIL MARKET; CREATOR OF THE CYBERCHAIR VR FURNITURE. VR and Experience Simulator Inventions By Scott D Redmond. Scott is the Developer, Patent Winner, Producer and Innovator for key VR, tactical and flight simulator industry "firsts" including the "Holodeck" (Also known as "The Cave") VR Chamber", VR Glasses wearables decades before Google Glass was even conceived of, CyberChair (used in the national Merrill Lynch TV commercial), the "First VRML" software and web browser under Windows, and Tactile VR Surfaces. Scott received significant media coverage about his many inventions in this field. He was featured on E! Entertainment Network for advising the Oliver Stone TV Series: "Wild Palms" and for building and receiving the first U.S. Federal patents on the first working VR Cave and VR Holodeck walk-in synthetic reality chambers as seen on major TV shows. His "Cyber-Pod" was the world's first 360 degree rotation, all-axis, spinning human gyro device for total VR immersion working in a public venue. It was also the first to be entirely PC powered and rendered. His devices are used globally in military, medical, CAD, entertainment and design fields. Scott also produced the first VR Bunji Jump experience where his team helicopter high-resolution photographed the Grand Canyon for a virtual Bunji Jump from the rim to the Colorado River below. His VR rides were experienced nationwide in major sports stadiums and other venues. Scott was a business partner with Silicon Graphics.

1  
2 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
3 out the year for clients and employers.

4  
5 \* 1990 - American Society For Industrial Security - credentialed active coordinator  
6

7 \* 1990 - International Narcotic Enforcement Officers Association - credentialed active  
8 coordinator  
9

10 =====

11  
12 1991 -  
13

14 \* California Association of Licensed Investigators - credentialed active coordinator  
15

16 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
17 out the year for clients and employers.  
18

19 =====

20  
21 1993 -  
22

23 \* U.S. PATENT AWARD --- Virtual Reality invention patent. Federal patent awarded as  
24 first-to-invent. - PRODUCER: THE FIRST VR GLASSES-FORMAT HEAD MOUNTED  
25 DISPLAY SOLD IN COMMERCE; PRODUCER AND PATENT AWARDEE: THE WORLD'S  
26 FIRST PATENTED, WORKING, HOLODECK/CAVE VR CHAMBER; PRODUCER: THE  
27 FIRST 360 DEGREE PC-BASED FLIGHT SIMULATOR & NATIONAL SPORTS STADIUM  
28 TOUR SHOWCASE; DEVELOPER: THE FIRST VRML VR SOFTWARE 3D WEB BROWSER;

PRODUCER: FIRST FRESNEL VR LENS SOLD IN RETAIL MARKET; CREATOR OF THE CYBERCHAIR VR FURNITURE. VR and Experience Simulator Inventions By Scott D Redmond. Scott is the Developer, Patent Winner, Producer and Innovator for key VR, tactical and flight simulator industry "firsts" including the "Holodeck" (Also known as "The Cave") VR Chamber", VR Glasses wearables decades before Google Glass was even conceived of, CyberChair (used in the national Merrill Lynch TV commercial), the "First VRML" software and web browser under Windows, and Tactile VR Surfaces. Scott received significant media coverage about his many inventions in this field. He was featured on E! Entertainment Network for advising the Oliver Stone TV Series: "Wild Palms" and for building and receiving the first U.S. Federal patents on the first working VR Cave and VR Holodeck walk-in synthetic reality chambers as seen on major TV shows. His "Cyber-Pod" was the world's first 360 degree rotation, all-axis, spinning human gyro device for total VR immersion working in a public venue. It was also the first to be entirely PC powered and rendered. His devices are used globally in military, medical, CAD, entertainment and design fields. Scott also produced the first VR Bunji Jump experience where his team helicopter high-resolution photographed the Grand Canyon for a virtual Bunji Jump from the rim to the Colorado River below. His VR rides were experienced nationwide in major sports stadiums and other venues. Scott was a business partner with Silicon Graphics.

\* Scott works as Program Director, Inventor/Product Developer and Investigator throughout the year for clients and employers.

=====

1994 -

\* Amazon History. Amazon Founded - 1994. Bald guy figures out way to spy on everyone using cheap retail products. He had no streaming video until years after Scott showed him his video tranz-casting technology.

1994 -

\* White House commendation on White House letterhead, by Vice President Al Gore, for first online interactive video & gaming network in 1994.

\* Scott works as Program Director, Inventor/Product Developer and Investigator throughout the year for clients and employers.

=====

1995 -

\* U.S. PATENT AWARD --- Virtual Reality invention patent. Federal patent awarded as first-to-invent. - PRODUCER: THE FIRST VR GLASSES-FORMAT HEAD MOUNTED DISPLAY SOLD IN COMMERCE; PRODUCER AND PATENT AWARDEE: THE WORLD'S FIRST PATENTED, WORKING, HOLODECK/CAVE VR CHAMBER; PRODUCER: THE FIRST 360 DEGREE PC-BASED FLIGHT SIMULATOR & NATIONAL SPORTS STADIUM TOUR SHOWCASE; DEVELOPER: THE FIRST VRML VR SOFTWARE 3D WEB BROWSER; PRODUCER: FIRST FRESNEL VR LENS SOLD IN RETAIL MARKET; CREATOR OF THE CYBERCHAIR VR FURNITURE. VR and Experience Simulator Inventions By Scott D Redmond. Scott is the Developer, Patent Winner, Producer and Innovator for key VR, tactical and flight simulator industry "firsts" including the "Holodeck" (Also known as "The Cave") VR Chamber", VR Glasses wearables decades before Google Glass was even conceived of, CyberChair (used in the national Merrill Lynch TV commercial), the "First VRML" software and web browser under Windows, and Tactile VR Surfaces. Scott received significant media coverage about his many inventions in this field. He was featured on E! Entertainment Network for advising the Oliver Stone TV Series: "Wild Palms" and for building and receiving the first U.S. Federal patents on the first

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1 working VR Cave and VR Holodeck walk-in synthetic reality chambers as seen on major TV  
2 shows. His "Cyber-Pod" was the world's first 360 degree rotation, all-axis, spinning human gyro  
3 device for total VR immersion working in a public venue. It was also the first to be entirely PC  
4 powered and rendered. His devices are used globally in military, medical, CAD, entertainment and  
5 design fields. Scott also produced the first VR Bunji Jump experience where his team helicopter  
6 high-resolution photographed the Grand Canyon for a virtual Bunji Jump from the rim to the  
7 Colorado River below. His VR rides were experienced nationwide in major sports stadiums and  
8 other venues. Scott was a business partner with Silicon Graphics.

9  
10 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
11 out the year for clients and employers.

12  
13 =====

14  
15  
16 1998 -

17  
18 \* Google Started. Sergey and Larry are at Stanford doing dope and abusing freshmen while  
19 playing in Susan's garage. Rajeev Motwani, suggests they make a spy-on-the-public surveillance  
20 system based on Scott's already existing Unifree (tm) engine and website and his TechMate (tm)  
21 Company. Rajeev Motwani was later found floating, dead, in his Silicon Valley swimming pool.  
22 Maybe he knew too much? Same with Gary D. Conley...

23  
24 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
25 out the year for clients and employers.

26  
27  
28 =====

1  
2 1996 -  
3

4 \* U.S. PATENT AWARD --- First Global Video Web Video Patents Awarded to Scott.  
5 Before YouTube, Hulu, Vudu, Netflix Streaming, Sony VUE, Napster, Bittorrent or Kontiki  
6 existed, Scott had already delivered Clickmovie.com. Clickmovie did everything that those later  
7 competitors did before any of them even existed. Scott Douglas Redmond received multiple US  
8 patents confirming him as first-to-invent and deliver web video-on-demand. Scott Douglas  
9 Redmond designed, built and patented some of the first video-on-demand hardware devices. He was  
10 the first person to present internet video-on-demand to a full Sony Pictures international Board  
11 Meeting and his work-group is featured in Sony Pictures patent filings. Scott's patent filings and  
12 NDA's show that he designed, engineered, patent filed and produced the touch-screen, MP3 cell  
13 phone before Steve Jobs and Apple did and before any internal communications at Apple discuss  
14 the "iPhone". The patent office has credited Scott as the first to invent chunks/torrents/bits as a web  
15 media broadcast method. Scott Douglas Redmond designed, built and patented some of the first  
16 video-on-demand hardware devices. Scott Douglas Redmond designed, built and patented some of  
17 the first video-on-demand hardware devices.  
18

19 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
20 out the year for clients and employers.  
21

22 =====  
23

24 1997 -  
25

26 \* U.S. PATENT AWARD --- Internet Video Broadcasting invention patent. Federal patent  
27 awarded as first-to-invent. Before YouTube, Hulu, Vudu, Netflix Streaming, Sony VUE, Napster,  
28 Bittorrent or Kontiki existed, Scott had already delivered Clickmovie.com. Clickmovie did



1 everything that those later competitors did before any of them even existed. Scott Douglas  
2 Redmond received multiple US patents confirming him as first-to-invent and deliver web video-on-  
3 demand. Scott Douglas Redmond designed, built and patented some of the first video-on-demand  
4 hardware devices. He was the first person to present internet video-on-demand to a full Sony  
5 Pictures international Board Meeting and his work-group is featured in Sony Pictures patent filings.  
6 Scott's patent filings and NDA's show that he designed, engineered, patent filed and produced the  
7 touch-screen, MP3 cell phone before Steve Jobs and Apple did and before any internal  
8 communications at Apple discuss the "iPhone". The patent office has credited Scott as the first to  
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10 built and patented some of the first video-on-demand hardware devices. Scott Douglas Redmond  
11 designed, built and patented some of the first video-on-demand hardware devices.

12  
13 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
14 out the year for clients and employers.

15  
16 =====

17  
18 1998 -

19  
20 \* Energy industry ruckus. Rare-Earth mining corruption gets expands. A 1998 memo written  
21 by al-Qaida military chief Mohammed Atef reveals that Osama bin Laden's group had detailed  
22 knowledge of negotiations that were taking place between Afghanistan's ruling Taliban and  
23 American government and business leaders over plans for a U.S. oil and gas pipeline across that  
24 Central Asian country. The e-mail memo was found in 1998 on a computer seized by the FBI  
25 during its investigation into the 1998 African embassy bombings, which were sponsored by al-  
26 Qaida. Atef's memo was discovered by FBI counter-terrorism expert John O'Neill, who left the  
27 bureau in 2001, complaining that U.S. oil interests were hindering his investigation into al-Qaida.  
28 O'Neill, who became security chief at the World Trade Center, died in the Sept. 11 attack. This led

1 to the Afghan mining corruption for electric car minerals.

2  
3 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
4 out the year for clients and employers.

5  
6 =====

7  
8 1999 -

9  
10 \* U.S. PATENT AWARD --- Internet Video Broadcasting invention patent. Federal patent  
11 awarded as first-to-invent. Before YouTube, Hulu, Vudu, Netflix Streaming, Sony VUE, Napster,  
12 Bittorrent or Kontiki existed, Scott had already delivered Clickmovie.com. Clickmovie did  
13 everything that those later competitors did before any of them even existed. Scott Douglas  
14 Redmond received multiple US patents confirming him as first-to-invent and deliver web video-on-  
15 demand. Scott Douglas Redmond designed, built and patented some of the first video-on-demand  
16 hardware devices. He was the first person to present internet video-on-demand to a full Sony  
17 Pictures international Board Meeting and his work-group is featured in Sony Pictures patent filings.  
18 Scott's patent filings and NDA's show that he designed, engineered, patent filed and produced the  
19 touch-screen, MP3 cell phone before Steve Jobs and Apple did and before any internal  
20 communications at Apple discuss the "iPhone". The patent office has credited Scott as the first to  
21 invent chunks/torrents/bits as a web media broadcast method. Scott Douglas Redmond designed,  
22 built and patented some of the first video-on-demand hardware devices. Scott Douglas Redmond  
23 designed, built and patented some of the first video-on-demand hardware devices.

24  
25 1999 - May -

26  
27 \* TV documentary broadcast by "SILICON VALLEY BUSINESS", nationwide, proves that  
28 Scott was first to design, patent, build and broadcast before YouTube, Hulu, Vudu, Netflix

Pg 1825 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 Streaming, Sony VUE, Napster, Bittorrent or Kontiki existed, Scott had already delivered  
2 Clickmovie.com. Clickmovie did everything that those later competitors did before any of them  
3 even existed. Scott Douglas Redmond received multiple US patents confirming him as first-to-  
4 invent and deliver web video-on-demand. Scott Douglas Redmond designed, built and patented  
5 some of the first video-on-demand hardware devices. He was the first person to present internet  
6 video-on-demand to a full Sony Pictures international Board Meeting and his work-group is  
7 featured in Sony Pictures patent filings. Scott's patent filings and NDA's show that he designed,  
8 engineered, patent filed and produced the touch-screen, MP3 cell phone before Steve Jobs and  
9 Apple did and before any internal communications at Apple discuss the "iPhone". The patent office  
10 has credited Scott as the first to invent chunks/torrents/bits as a web media broadcast method. Scott  
11 Douglas Redmond designed, built and patented some of the first video-on-demand hardware  
12 devices. Scott Douglas Redmond designed, built and patented some of the first video-on-demand  
13 hardware devices.

14  
15 \* <http://www.wired.com/news/news/technology/story/18645/html>

16  
17 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
18 out the year for clients and employers.

19  
20 =====

21  
22 2000 -

23  
24 \* 2000 - California Department of Consumer Affairs Investigator - credentialed active  
25 coordinator

26  
27 \* 2000-2008 - Investigative Consultant to Congressional and journalism organizations  
28

Pg 1826 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

\* 2009- 2018 - Assisted agencies in one of the largest anti-corruption projects in the last decade. Recipient of White House and Congressional Commendations and Federal Grants. Instrumental in creating multiple federal laws and legal precedents. Designed key sting-operation protocols. Created first digital crowd-sourced law enforcement technologies. Received multiple federal patents on IC and LE technologies. Multiple high-profile white-collar case wrap-ups Also related are: SFPD Case # 150528148 ( - Company E (Northern District) Per Officer Liu – Badge # 4742 ) is relevant. Master case # Case # 22-cv-01107-TSH in Northern District is key case matter. Police incident report # 25119268 is relevant. OSC Case File No. MA-19-002006 is relevant. OSC Case File DI-15-4541 is relevant. California Victim Compensation & Government Claims Board Claim # G628261 is relevant. Also relevant are: Case No. 1:20-cv-03010 ( Google monopoly and competitor attacks case); Case No. 11-CV-2509 ( <https://www.cand.uscourts.gov/judges/koh-lucy-h-lhk/in-re-high-tech-employee-antitrust-litigation/> ); Task force Case No. 20-xyz2020a ( <http://www.case-xyz2020a.com/> ); Case No. 20-03664 ( <https://www.insurancejournal.com/app/uploads/2020/06/brown-v-google.pdf> ); Case No. 1:12-CV-00774-mms and related cases. ( <https://thehill.com/blogs/congress-blog/the-administration/250109-a-case-study-in-pay-to-play-cronyism>. Criminal referrals against the attackers have been filed with the FBI, DOJ, SEC, FEC, FTC ); Case No. 18-cv-8865 (S.D.N.Y.)(SEC v. Elon Musk for lies and scams ); Case No. 18-cv-8947 (S.D.N.Y.)( SEC v. Tesla, Inc. for lies and scams ); Case No. 1:14-cv-270143 ( Google racketeering charges - <https://artistrightswatch.com/2017/10/08/googles-racketeering-challenge/> ); Case No. 1:19-cr-00490 ( United States v. Epstein - Big tech sex cult crimes case ); Case No. 129 So.3d 1196 (Fla. 2d DCA 2014); 170 So.3d 125 (Fla. 2d DCA 2015) ( Gawker Media, LLC v. Bollea in which Gawker, Deadspin, Gizmodo, Jalopnik, Jezebel, Kotaku and Lifehacker were exposed as character assassination and money-laundering fronts working for notorious third parties); Case No. 19-cv-343672 James Martin (on behalf of ALPHABET INC) v Larry Page et al (Sex Cults In Silicon Valley ); Case No. CGC-11-508414, California Superior Court, San Francisco (Plaintiffs v Google ); Case No. 3:16-cv-03061 U.S. DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA, San Francisco Division ( Plaintiffs V. Google/Alphabet/YouTube); Case No. 18-CIV05380 Rubin Vs. Rubin (Google sex cult and sex

1 slave charges ); Case No. : 1:17 - cv - 06404 Vs. Rubin (Organized crime sex trafficking stock  
2 market manipulators ); Case No. D.C. No. 3:17-cv-05369 - VC (Big tech harassment of  
3 outsiders);Case No. 3:21-cv-00077 (Another of many lawsuits proving that the Silicon Valley  
4 Cartel conspires to manipulate media and markets) and the SFPD Roger Boas case records.

5  
6 =====

7  
8 2001 -

9  
10 \* U.S. PATENT AWARD --- iPhone and PDA design invention patent. Federal patent  
11 awarded as first-to-invent. Apple did not even have their iPhone and iPod in development yet.

12  
13 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
14 out the year for clients and employers.

15  
16 =====

17  
18  
19 2002 -

20  
21 \* U.S. PATENT AWARD --- iPhone and PDA design invention patent. Federal patent  
22 awarded as first-to-invent. Apple did not even have their iPhone and iPod in development yet.

23  
24 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
25 out the year for clients and employers.

26  
27 =====

1 2001 -

2  
3 \* The Day - Sept 11, 2001 - September 11, 2001, For 50 minutes, from 8:15 AM until 9:05  
4 AM, with it widely known within the FAA and the military that four planes have been  
5 simultaneously hijacked and taken off course, no one notifies the President of the United States. It is  
6 not until 9:30 that any Air Force planes are scrambled to intercept, but by then it is too late. This  
7 means that the National Command Authority waited for 75 minutes before scrambling aircraft, even  
8 though it was known that four simultaneous hijackings had occurred, an event that has never  
9 happened in history. [Sources: CNN, ABC, MS-NBC, The Los Angeles Times, The New York  
10 Times.] Afghanistan at that time was targeted for rare earth mining by Big Tech oligarchs. 2 of  
11 Scott's business associates were in the planes and one was in the towers, including Daniel M.  
12 Lewin, Co-Founder and CTO of Akamai who had been in partnership discussions with Scott for  
13 Scott's video patents.

14  
15 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
16 out the year for clients and employers.

17  
18 =====

19  
20  
21 2002 -

22  
23 \* U.S. PATENT AWARD --- Internet Video Broadcasting invention patent. Federal patent  
24 awarded as first-to-invent. Before YouTube, Hulu, Vudu, Netflix Streaming, Sony VUE, Napster,  
25 Bittorrent or Kontiki existed, Scott had already delivered Clickmovie.com. Clickmovie did  
26 everything that those later competitors did before any of them even existed. Scott Douglas  
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28 demand. Scott Douglas Redmond designed, built and patented some of the first video-on-demand

1 hardware devices. He was the first person to present internet video-on-demand to a full Sony  
2 Pictures international Board Meeting and his work-group is featured in Sony Pictures patent filings.  
3 Scott's patent filings and NDA's show that he designed, engineered, patent filed and produced the  
4 touch-screen, MP3 cell phone before Steve Jobs and Apple did and before any internal  
5 communications at Apple discuss the "iPhone". The patent office has credited Scott as the first to  
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11 out the year for clients and employers.

12  
13 =====

14  
15 2002 -

16  
17 \* ANOTHER U.S. PATENT AWARD --- Internet Video Broadcasting invention patent.  
18 Federal patent awarded as first-to-invent. Before YouTube, Hulu, Vudu, Netflix Streaming, Sony  
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3  
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5 out the year for clients and employers.

6  
7 =====

8  
9 2002 -

10  
11 \* U.S. PATENT AWARD --- Electronic ion propulsion micro-thrusters invention patent.  
12 Federal patent awarded as first-to-invent by showing the U.S. Patent Office directors an in-flight  
13 entirely electric beam energy powered drone in flight in the conference room of Intel's patent  
14 attorney team, who verified the veracity of the flight. Scott's patent over-wrote NASA's patent on  
15 the technology which had been covert until the USPTO was forced to reveal it in Scott's patent  
16 prosecution.

17  
18 \* Scott Douglas Redmond and his Team produced, developed, and/or engineered and  
19 delivered fully functional software that was first-to-market and first-of-its-kind in media, video-on-  
20 demand, VR, IT, P2P, Aerospace, Telecom, medical and other industries. Scott Douglas Redmond  
21 has won numerous federal patent awards, Congressional awards, innovation awards, federal grants,  
22 commendations and has received hundreds of letters of references from top policy leaders,  
23 corporate executives, past clients and employers. A "patent" is a filing of a claim with the U.S.  
24 Government. You 1.) file a notice that you have invented something. Then 2.)the U.S. Government  
25 files a notice back to you saying "nope, no you didn't, prove it...3.)" Then you file things that prove  
26 that you were the first, original, inventor of that thing. 4.) Then the U.S. Government uses it's entire  
27 compliment of investigation and research tools to confirm if you were really the inventor. You can't  
28 just "pay some money and get a patent". In those rare cases when 5.) the U.S. Government awards



1 you a patent, it means that the entire U.S. Government has decided to stand behind you and say:  
2 "Yep, we checked it out, this guy really is the one who invented this thing!". Getting a patent is a  
3 big deal because it means that years of federal investigation has confirmed that you really were the  
4 one who created that thing.

5  
6 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
7 out the year for clients and employers.

8  
9 =====

10  
11 2002 -

12  
13 \* U.S. PATENT AWARD ---Electric Vehicle Powerplant Design invention patent.  
14 Additional Federal patent awarded as first-to-invent. Scott and his team were awarded a  
15 Congressionally mandated multi million dollar-value contract in the Iraq War. He produced vehicle  
16 systems, energy production and storage technologies created by Scott Douglas Redmond. Scott won  
17 numerous federal patent awards, Congressional awards, innovation awards, federal grants and broke  
18 energy storage records. Scott's projects have rebuilt or ground-up constructed numerous vehicles.  
19 He was awarded the seminal patents for solid-state fuel cell energy storage and distribution for  
20 Honda, Toyota, KIA and BMW fuel cell cars. He was awarded Congressional funding in the Iraq  
21 War Bill to help build America's next-generation energy system. Scott's vehicles had the highest  
22 calculated fuel efficiency in the world, the lowest cost-to- manufacture, the lowest selling price, the  
23 most attractive debt-ratio, the highest safety factor, the most hires of laid off Detroit factory workers  
24 and executives and the biggest volume of sales order requests! His vehicle and energy companies  
25 were financed by himself, the federal government, Autodesk and other major partners. Government  
26 labs evaluated Scott's technologies and wrote technical white papers confirming that they beat all  
27 other alternative energy storage technologies on over 50 metric comparisons. Scott Douglas  
28 Redmond and his Team designed and built numerous pressure-membrane air structures for

1 aerospace and vehicular uses.

2  
3 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
4 out the year for clients and employers.

5  
6 =====

7  
8 2003 -

9  
10 \* ANOTHER U.S. PATENT AWARD ---Electric Vehicle Powerplant Design invention  
11 patent. Additional Federal patent awarded as first-to-invent. Scott and his team were awarded a  
12 Congressionally mandated multi million dollar-value contract in the Iraq War. He produced vehicle  
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27  
28 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-

1 out the year for clients and employers.

2  
3 =====

4  
5 2004 -

6  
7 \* ANOTHER U.S. PATENT AWARD ---Electric Vehicle Powerplant Design invention  
8 patent. Additional Federal patent awarded as first-to-invent. Scott and his team were awarded a  
9 Congressionally mandated multi million dollar-value contract in the Iraq War. He produced vehicle  
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15 War Bill to help build America's next-generation energy system. Scott's vehicles had the highest  
16 calculated fuel efficiency in the world, the lowest cost-to- manufacture, the lowest selling price, the  
17 most attractive debt-ratio, the highest safety factor, the most hires of laid off Detroit factory workers  
18 and executives and the biggest volume of sales order requests! His vehicle and energy companies  
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21 other alternative energy storage technologies on over 50 metric comparisons. Scott Douglas  
22 Redmond and his Team designed and built numerous pressure-membrane air structures for  
23 aerospace and vehicular uses.

24  
25 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
26 out the year for clients and employers.

27  
28 =====

1  
2 2005 -  
3

4 \* Congressional Iraq War Bill Award. Federal Contract awarded to Scott to build America's  
5 energy back-up plan. Scott and his team were awarded a Congressionally mandated multi million  
6 dollar-value contract in the Iraq War. He produced vehicle systems, energy production and storage  
7 technologies created by Scott Douglas Redmond. Scott won numerous federal patent awards,  
8 Congressional awards, innovation awards, federal grants and broke energy storage records. Scott's  
9 projects have rebuilt or ground-up constructed numerous vehicles. He was awarded the seminal  
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12 next-generation energy system. Scott's vehicles had the highest calculated fuel efficiency in the  
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14 highest safety factor, the most hires of laid off Detroit factory workers and executives and the  
15 biggest volume of sales order requests! His vehicle and energy companies were financed by  
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18 energy storage technologies on over 50 metric comparisons. Scott Douglas Redmond and his Team  
19 designed and built numerous pressure-membrane air structures for aerospace and vehicular uses.  
20

21 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
22 out the year for clients and employers.  
23

24 =====  
25

26 2005 -  
27

28 \* The EV For Everyone. The Ultimate Electric Car. The U.S. Department of Energy, via a

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1 Congressional order in the Federal Register, Contracts Scott and his Team to design the electric car  
2 that beats every other EV on price, safety, range, no offshore dependency, and all other metrics. He  
3 does it, but Tesla, the Senators that own Tesla (Yes, politicians own the companies they are in  
4 charge of regulating but THE STOCK ACT, in Congress, will fix that) and Detroit go nuts with  
5 anti-trust law violations because his car obsoletes their CAR-tel monopoly. He contracts most of the  
6 Detroit car builders and NASA engineers that got laid off in the down-turn.

7  
8 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
9 out the year for clients and employers.

10  
11 =====

12  
13  
14 2005 -

15  
16 \* Amazon History - Amazon Prime truck delivery service announced. Bald guy figures out  
17 way to drive to your house and spy on you without you noticing by dangling food at you.

18  
19 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
20 out the year for clients and employers.

21  
22 =====

23  
24  
25 2006 -

26  
27 \* Amazon History - Launched on September 7, 2006, as Amazon Unbox in the United  
28 States, the service grew with an expanding library, and added the Prime Video membership upon

1 the development of the Prime subscription. It was then renamed as Amazon Instant Video on  
2 Demand. After acquiring the UK-based streaming and DVD-by-mail service LoveFilm in 2011,[4]  
3 Prime Video was added to the Prime subscription in the United Kingdom, Germany and Austria in  
4 2014. Scott had already been doing this, with his earlier companies, since before 1998.

5  
6 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
7 out the year for clients and employers.

8  
9 =====

10  
11 2007 -

12  
13 \* Amazon History - Amazon takes ove Whole Foods. Amazon buys Whole Foods and  
14 workers and public get nothing out of it except: "screwed" and spied on re: their buying habits.

15  
16 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
17 out the year for clients and employers.

18  
19 =====

20  
21 2007 -

22  
23 \* ANOTHER U.S. PATENT AWARD ---Electric Vehicle Powerplant Design invention  
24 patent. Additional Federal patent awarded as first-to-invent. Scott and his team were awarded a  
25 Congressionally mandated multi million dollar-value contract in the Iraq War. He produced vehicle  
26 systems, energy production and storage technologies created by Scott Douglas Redmond. Scott won  
27 numerous federal patent awards, Congressional awards, innovation awards, federal grants and broke  
28 energy storage records. Scott's projects have rebuilt or ground-up constructed numerous vehicles.

Pg 1837 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 He was awarded the seminal patents for solid-state fuel cell energy storage and distribution for  
2 Honda, Toyota, KIA and BMW fuel cell cars. He was awarded Congressional funding in the Iraq  
3 War Bill to help build America's next-generation energy system. Scott's vehicles had the highest  
4 calculated fuel efficiency in the world, the lowest cost-to- manufacture, the lowest selling price, the  
5 most attractive debt-ratio, the highest safety factor, the most hires of laid off Detroit factory workers  
6 and executives and the biggest volume of sales order requests! His vehicle and energy companies  
7 were financed by himself, the federal government, Autodesk and other major partners. Government  
8 labs evaluated Scott's technologies and wrote technical white papers confirming that they beat all  
9 other alternative energy storage technologies on over 50 metric comparisons. Scott Douglas  
10 Redmond and his Team designed and built numerous pressure-membrane air structures for  
11 aerospace and vehicular uses.

12  
13 \* Top-level politicians and their big tech investors operate whistle-blower and anti-trust  
14 attacks against Scott as Scott reports to federal agencies on insider trading and bribery in big  
15 tech/energy/telco cases.

16  
17 \* Scott works as Program Director, Inventor/Product Developer and Investigator through-  
18 out the year for clients and employers.

19  
20 =====

21  
22 2008 -

23  
24 \* Scott testifies to Congress, regulatory and federal law enforcement agencies for an large,  
25 active, case matter.

26  
27 \* Scott meets with members of the Feinstein and Pelosi staff and family.  
28

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2011 -

\* ANOTHER U.S. PATENT AWARD ---Electric Vehicle Powerplant Design invention patent. Additional Federal patent awarded as first-to-invent. Scott and his team were awarded a Congressionally mandated multi million dollar-value contract in the Iraq War. He produced vehicle systems, energy production and storage technologies created by Scott Douglas Redmond. Scott won numerous federal patent awards, Congressional awards, innovation awards, federal grants and broke energy storage records. Scott's projects have rebuilt or ground-up constructed numerous vehicles. He was awarded the seminal patents for solid-state fuel cell energy storage and distribution for Honda, Toyota, KIA and BMW fuel cell cars. He was awarded Congressional funding in the Iraq War Bill to help build America's next-generation energy system. Scott's vehicles had the highest calculated fuel efficiency in the world, the lowest cost-to- manufacture, the lowest selling price, the most attractive debt-ratio, the highest safety factor, the most hires of laid off Detroit factory workers and executives and the biggest volume of sales order requests! His vehicle and energy companies were financed by himself, the federal government, Autodesk and other major partners. Government labs evaluated Scott's technologies and wrote technical white papers confirming that they beat all other alternative energy storage technologies on over 50 metric comparisons. Scott Douglas Redmond and his Team designed and built numerous pressure-membrane air structures for aerospace and vehicular uses.

=====

2011 -



1           \* ANOTHER U.S. PATENT AWARD ---Electric Vehicle Powerplant Design invention  
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18  
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20           =====

21  
22           2011 -

23  
24           \* ANOTHER U.S. PATENT AWARD ---Electric Vehicle Powerplant Design invention  
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13  
14 =====

15  
16 2013 -

17  
18 \* ANOTHER U.S. PATENT AWARD --- Internet Video Broadcasting invention patent.  
19 Federal patent awarded as first-to-invent. Before YouTube, Hulu, Vudu, Netflix Streaming, Sony  
20 VUE, Napster, Bittorrent or Kontiki existed, Scott had already delivered Clickmovie.com.  
21 Clickmovie did everything that those later competitors did before any of them even existed. Scott  
22 Douglas Redmond received multiple US patents confirming him as first-to-invent and deliver web  
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26 filings. Scott's patent filings and NDA's show that he designed, engineered, patent filed and  
27 produced the touch-screen, MP3 cell phone before Steve Jobs and Apple did and before any internal  
28 communications at Apple discuss the "iPhone". The patent office has credited Scott as the first to

Pg 1841 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 invent chunks/torrents/bits as a web media broadcast method. Scott Douglas Redmond designed,  
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4  
5 =====

6  
7 2013 -

8  
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22 designed, built and patented some of the first video-on-demand hardware devices.

23  
24 =====

25  
26  
27 2015 -  
28

1           \* ANOTHER U.S. PATENT AWARD --- Internet Video Broadcasting invention patent.  
2 Federal patent awarded as first-to-invent. Before YouTube, Hulu, Vudu, Netflix Streaming, Sony  
3 VUE, Napster, Bittorrent or Kontiki existed, Scott had already delivered Clickmovie.com.  
4 Clickmovie did everything that those later competitors did before any of them even existed. Scott  
5 Douglas Redmond received multiple US patents confirming him as first-to-invent and deliver web  
6 video-on-demand. Scott Douglas Redmond designed, built and patented some of the first video-on-  
7 demand hardware devices. He was the first person to present internet video-on-demand to a full  
8 Sony Pictures international Board Meeting and his work-group is featured in Sony Pictures patent  
9 filings. Scott's patent filings and NDA's show that he designed, engineered, patent filed and  
10 produced the touch-screen, MP3 cell phone before Steve Jobs and Apple did and before any internal  
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13 built and patented some of the first video-on-demand hardware devices. Scott Douglas Redmond  
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15  
16 =====

17  
18 2015 -

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6  
7 =====

8  
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10  
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13 Sony VUE, Napster, Bittorrent or Kontiki existed, Scott had already delivered Clickmovie.com.  
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25  
26 =====

27  
28 2017 -

1  
2 \* AND YET ANOTHER U.S. PATENT AWARD --- Internet Video Broadcasting invention  
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7  
8 =====

9  
10 2018 -

11  
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26  
27 =====  
28

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2020 -

- U.S. Energy Dept Anti-Corruption Federal Anti-Corruption Lawsuit Won by Scott and his team. Scott and his associates sued the Dept of Energy for corruption, cronyism and insider trading scams in an epic public-interest lawsuit. This first-of-its-kind action got the Secretary of Energy and the Attorney General fired, created a huge number of federal investigations, documented all of the crooked politicians in global media, created new anti-corruption laws and won Scott a Federal Remand award.

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2022 -

\* On 2-22-22 - Scott files a group of the largest anti-corruption lawsuits ever produced. - SPECIALIST RESEARCHER: FEDERAL LAW ENFORCEMENT TASK-FORCES AND FTC, GAO, IG ADVISOR.- WINNER: WORLD'S FIRST FEDERAL ANTI-CORRUPTION TORT JUDGMENT IN DC COURT.- Scott Douglas Redmond is a credentialed law enforcement and IC expert witness and forensics researcher. He has helped create federal laws, The "USA JOBS ACT", legal precedents and anti-corruption technologies.

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ADDITIONAL HIGHLIGHTS (PENDING FINAL DATE RESEARCH):



1  
2  
3 \* Scott Douglas Redmond was one of the promotional graphics coordinators for Olympic-  
4 type events and major media launches including the creation of novel new media technologies  
5

6 \* Scott Douglas Redmond helped coordinate the conversion of Fort Mason Center from a  
7 WW2 dump to one of the leading public spaces in the nation. Scott's events broke attendance  
8 records, use statistics and "first-ever" records under Scott's producership.  
9

10 \* Scott Douglas Redmond was the Producer, Director, Author of "STAR RANGER". This  
11 award-winning film was the first 3D VR theme park ride film produced entirely on PC computers  
12 instead of Linux workstations.  
13

14 \* Scott Douglas Redmond was the Logistics Director for over a decade with the SF Blues  
15 Festival. It was one of the National Park Service's longest running public heritage events and  
16 featured the world's most renown performers.  
17

18 \* Scott Douglas Redmond Provided The Special Effects For Grace Slick's Album Cover  
19

20 \* Scott Douglas Redmond provided operations and technical support to a large number of  
21 major community programs which acquired dramatic upside for his clients.  
22

23 \* Scott Douglas Redmond: Developer, Patent Winner, Producer and Innovator for key VR,  
24 tactical and flight simulator industry "firsts" including the "Holodeck/Cave VR Chamber", VR  
25 Glasses wearables, CyberChair, the "First VRML" and Tactile VR Surfaces and received significant  
26 media coverage about his many inventions in this field.  
27

28 \* Scott Douglas Redmond was Creative Director and Founder of THE NOWHOUSE at The

1 San Francisco Giants Stadium. Scott has led numerous novel construction projects, Presented LIVE  
2 and nationally via CNET and the NAHB, millions of people learned about the latest construction  
3 technologies with this Smart Home program which was donated to the City of San Francisco and  
4 moved by barge to become a permanent community center. Scott's project was the inspiration for  
5 the Better Homes & Gardens TV series, which also featured Scott.

6  
7 \* Scott has developed and worked on numerous aerospace deployment and launch systems  
8 including: EARTHSTAR. EARTHSTAR was the first orbital visual communications and  
9 promotional satellite designed to be Earth-visible to the ordinary person and then burn up in an  
10 atmospheric fireworks show. A massive mylar inflatable was designed using old military rockets for  
11 boost. The launch company launched America's first private commercial rocket. Scott has launched  
12 numerous balloons to near-space and designed a MARS landing system for the first MARS Lander.  
13 NASA first rejected his airbag landing system for being 'too exotic' but, later, NASA discovered  
14 that the airbag landing system was the only one that worked. The airbags were, indeed, the system  
15 that finally delivered the first lander to MARS. Scott also won federal patents over NASA's earlier  
16 patents, for electronic ion propulsion technology.

17  
18 \* ART DIRECTOR: FOR VISUALIZATION PHASE OF MANY PROJECTS;  
19 UI/UX/HUMAN FACTORS ADVISOR: WEB AND PRODUCT USE DYNAMICS -

20 - Scott Douglas Redmond was the Artistic Director For hundreds of projects. He created and  
21 over-the-shoulder directed visualization artists from Disney, LucasFilm, Marvel Comics, DC  
22 Comics and other graphics arts leaders to show his concept ideas for future deliverables. Scott has  
23 produced original art for many of his projects in order to help clients and employers visualize the  
24 intent for the finished creation. He won national awards for: "STAR RANGER" (The first 3D ride-  
25 film produced entirely on PC's) and other productions. His book: "Conceptual Reality", covers some  
26 of the art from these projects.

27  
28 \* PRODUCER - ORGANIZER: RAPID DEPLOYMENT DISASTER RELIEF

1 PROGRAMS; DONOR - ASSOCIATE: ANIMAL RESCUE CENTERS; PRODUCER:  
2 COMPUTER LEARNING CENTER - CHILDRENS GARDEN; SCOTT DONATES MUCH OF  
3 HIS TIME AND INCOME TO COMMUNITY PROJECTS  
4

5 \* FOUNDER: "TECHMATE" AND "UNIFREE" - THE FIRST WEB SOCIAL MEDIA  
6 NETWORKS; Scott Douglas Redmond delivered some of the first online digital social network  
7 companies before Facebook, Google, MySpace and other 2nd generation social networks even  
8 existed as companies. The U.S. Patent office ruled that he had produced social media e-commerce  
9 decades before Mark Zuckerberg or Yahoo engineers had. State, Federal, City and County filings  
10 prove Scott's social media companies were first-on-the-web. Emails, contracts and NDA's further  
11 verify that fact.ties occurring in San Francisco, Los Altos, and Santa Cruz. Scott Douglas Redmond  
12 has donated a portion of his resources to charity and community service each year as Producer and  
13 Logistics Coordinator for many major community service projects.  
14

15 \* Scott Douglas Redmond helped coordinate the conversion of Fort Mason Center from a  
16 WW2 dump to one of the leading public spaces in the nation. Scott's events broke attendance  
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18 "THE WORLD'S LARGEST INDOOR GARAGE SALE", at Fort Mason, which broke attendance  
19 records and raised hundreds of thousands of dollars for charity in 48 hours. He ran support  
20 operations for the multi-million dollar Coca Cola "GREAT GET-TOGETHER" corporate super  
21 party, which also set records. Scott created the shuttle parking system between Fort Mason and the  
22 Presidio.  
23

24 \* AWARDEE: THE NATIONAL "BIG KAHUNA AWARD" FOR 3D VIDEO AS  
25 PRODUCER/DIRECTOR; PRODUCER - DIRECTOR: "STAR RANGER" - AWARD-WINNING  
26 WORLD'S FIRST 3D ANIMATED RIDE FILM MADE ON PC'S; PRODUCER - MULTIPLE  
27 FILM SHORTS AND CELL ANIMATION FILMS; - Scott Douglas Redmond was the Producer,  
28 Director, Author of "STAR RANGER". This award-winning film was the first 3D VR theme park

ride film produced entirely on PC computers instead of Linux workstations. He has been producing films since grade school.

\* LOGISTICS DIRECTOR: ANNUAL SF BLUES FESTIVAL CO-SPONSORED BY THE NATIONAL PARK SERVICE; Scott Douglas Redmond was the Logistics Director for over a decade with the historic SF Blues Festival. It was one of the National Park Service's longest running public heritage events and featured the world's most renown performers. For this project, Scott created the first shuttle parking system between Crissy Field and Fort Mason.

\* COORDINATION PRODUCER: THE GREAT GAMING HOUSE; Scott Douglas Redmond Production Coordinated THE GREAT GAMING HOUSE project created by Kelly Yeaton, The founder of Arena Theater in America. This project deployed the simultaneous operation of nearly 100 concurrent mini-theaters, inside a massive space, which walked you through the Game Of Life. Multiple theater companies worked together to realize this complex theatrical event.

\* PROGRAM DIRECTOR: FOR NATIONAL AND GLOBAL MULTI-MILLION PARTICIPANT PROGRAMS; ENGINEER: VARIOUS CORPORATE AND GOVERNMENT PROJECTS

- AWARDEE: WHITE HOUSE, STATE ASSEMBLY & MAYORAL COMMENDATIONS; Scott Douglas Redmond provided operations and technical support to a large number of major community programs which acquired dramatic upside for his clients. Scott Douglas Redmond Delivers Innovation for Corporations, Investors, Government Agencies, Community Service Groups, Congress and The Public. Scott Douglas Redmond led product design, engineering and product development on major market launches for top product designs in automotive, defense, energy, aerospace, media, telecom and more. Scott Douglas Redmond has donated a portion of his resources to charity and community service each year as Producer and Logistics Coordinator for many major community service projects. Scott Douglas Redmond has

1 written numerous articles, books and white papers. A large percentage of his writing is ghost-  
2 writing.

3  
4 \* PRODUCER - CREATOR: THE NOWHOUSE NATIONAL HOME-BUILDING  
5 TECHNOLOGY DEMO HOME PROGRAM; PRODUCER - DEVELOPER: MULTIPLE  
6 MODERN HOME SHOWCASE BUILDS; SHOW SUBJECT: DISCOVERY CHANNEL  
7 REALITY TV SERIES ON HOME BUILDING;\* Scott Douglas Redmond was Creative Director  
8 and Founder of THE NOWHOUSE at The San Francisco Giants Stadium. Scott has led numerous  
9 novel construction projects, Presented LIVE and nationally via CNET and the NAHB, millions of  
10 people learned about the latest construction technologies with this Smart Home program which was  
11 donated to the City of San Francisco and moved by barge to become a permanent community  
12 center. Scott's project was the inspiration for the Better Homes & Gardens TV series, which also  
13 featured Scott. Scott has produced numerous construction showcase homes and building efforts. He  
14 donated technologies from this effort to the Tsunami Recovery effort for Japan. THE NOWHOUSE  
15 was a multi-thousand square foot, 2-story, modern, high-tech demo home valued at \$3 million+  
16 (San Francisco Market Rate) donated to Gavin Newsom and The City Of San Francisco by Scott  
17 and his Team. Scott has produced multiple high-tech demonstration home projects for public and  
18 industry showcases. Scott has created multiple patented technologies for safe, non-toxic, efficient  
19 construction.

20  
21 \* DESIGNER - ARCHITECT - ENGINEER: AEROSPACE DEPLOYMENT SYSTEMS;  
22 CREATOR - DEVELOPER: "EARTHSTAR", THE WORLD'S FIRST PROMOTIONAL  
23 SATELLITE;- Scott has developed and worked on numerous aerospace deployment and launch  
24 systems including: EARTHSTAR. EARTHSTAR was the first orbital visual communications and  
25 promotional satellite designed to be Earth-visible to the ordinary person and then burn up in an  
26 atmospheric fireworks show. A massive mylar inflatable was designed using old military rockets for  
27 boost. The launch company launched America's first private commercial rocket. Scott has launched  
28 numerous balloons to near-space and designed a MARS landing system for the first MARS Lander.

1 NASA first rejected his airbag landing system for being 'too exotic' but, later, NASA discovered  
2 that the airbag landing system was the only one that worked. The airbags were, indeed, the system  
3 that finally delivered the first lander to MARS. Scott also won federal patents over NASA's earlier  
4 patents, for electronic ion propulsion technology. His issued federal patent describes micro-thruster  
5 technology and was demonstrated, in operation, to the United States Patent Office.

6  
7 \* Winner "Scientists Helping America" from DARPA.

8  
9 \* Founder/creator of one of the first, patented, lightest weight, lowest cost-to-manufacture,  
10 safest electric car technologies.

11  
12 \* Founder of America's leading green housing venture.

13  
14 \* Keynote Speaker: TechTextile material science convention, Las Vegas.

15  
16 \* Recipient of multiple mayoral and senate proclamations.

17  
18 \* Associate Speaker: National Education Conference- Chicago

19  
20 \* Developed community major events facilities and logistics for Fort Mason Center.

21  
22 \* Keynote speaker: Global Summit for Project Innovation National Convention.

23  
24 \* Awarded top grant by U.S. Congress in the Iraq War Bill, 2004. Listed in Congressional  
25 Register.

26  
27 \* Received multiple White House commendation letters from Vice President Al Gore.  
28

1           \* Developed The NowHouse national home construction technology showcase home at the  
2 San Francisco Giant's Stadium. Toured by visitors from around the world and visited online by  
3 millions.

4  
5           \* Facility Manager: Showplace Square commercial design and architectural resources centre  
6 as personal associate to founder, Henry Adams.

7  
8           \* Executive Director: The Family Foundation. Benefitting child, animal, medical & social  
9 issues.

10  
11          \* Winner, National Award for best Producer/Director from 3D Design Magazine.

12  
13          \* Developed & patented first global low-band, DVD-quality internet broadcasting network  
14 and delivered the system and multiple working software packages prior to any other online video  
15 system of it's kind. Web products and sites included: ClickMovie.com, Personal Producer, Trailer  
16 Park and others. First to develop, patent and demo peer-to-peer and particulated file media delivery.  
17 A global standard for large file delivery as shown in United States patent filings, federal records,  
18 filed records, industry reports and other documented proofs of invention. (See Firechat, Napster,  
19 Bittorrent, Kontiki, Vudu, MS Avalanche, etc.)

20  
21          \* First to develop, patent and demo mobile media device PDA form factor and architecture  
22 and to demonstrate VOD on HP IPAQ PDA. Beat Apple iPhone by many years prior IP.

23  
24          \* First to invent and show iPhone™ wearable VR headset integrating iPhone™ into goggles

25  
26          \* Recipient of hundreds of letters of reference and acclaim (as shown in the attached links)  
27 from industry and government leaders (Multiple administrations), Mayors (multiple  
28 administrations), Fortune 1000 leaders, Government Agency heads, Community organization

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1 executives State assemblies and many more.

2  
3 \* His mobile App, "Democri-C" , with help from Steve Job's office at Apple Computer, was  
4 the first refugee to-peer software in the world, in use for disaster communications and regime  
5 change worldwide. He has received multiple issued patents on the technology.

6  
7 \* Created one of the first online "design-to-build" technology for modern home design and  
8 construction.

9  
10 \* Research and Design for RPI; Designed first touring 360 degree single user, pc-based  
11 virtual reality attraction for FOX Network. Created play-along low-bandwidth broadcast gaming  
12 software, over 100 different head-mounted display designs, numerous motion base ride designs and  
13 HSS software development system.

14  
15 \* Scott Douglas Redmond helped coordinate the conversion of Fort Mason Center from a  
16 WW2 dump to one of the leading public spaces in the nation. Scott's events broke attendance  
17 records, use statistics and "first-ever" records under Scott's producership.

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1           \* Scott Douglas Redmond was Creative Director and Founder of THE NOWHOUSE at The  
2 San Francisco Giants Stadium. Scott has led numerous novel construction projects, Presented LIVE  
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22 shoulder directed visualization artists from Disney, LucasFilm, Marvel Comics, DC Comics and  
23 other graphics arts leaders to show his concept ideas for future deliverables. Scott has produced  
24 original art for many of his projects in order to help clients and employers visualize the intent for  
25 the finished creation. He won national awards for: "STAR RANGER" (The first 3D ride-film  
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6 operations for the multi-million dollar Coca Cola "GREAT GET-TOGETHER" corporate super  
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8 Presidio.

9  
10           \* COORDINATION PRODUCER: THE GREAT GAMING HOUSE; Scott Douglas  
11 Redmond Production Coordinated THE GREAT GAMING HOUSE project created by Kelly  
12 Yeaton, The founder of Arena Theater in America. This project deployed the simultaneous  
13 operation of nearly 100 concurrent mini-theaters, inside a massive space, which walked you through  
14 the Game Of Life. Multiple theater companies worked together to realize this complex theatrical  
15 event.

16  
17           \* PRODUCER - CREATOR: THE NOWHOUSE NATIONAL HOME-BUILDING  
18 TECHNOLOGY DEMO HOME PROGRAM; PRODUCER - DEVELOPER: MULTIPLE  
19 MODERN HOME SHOWCASE BUILDS; SHOW SUBJECT: DISCOVERY CHANNEL  
20 REALITY TV SERIES ON HOME BUILDING - Scott Douglas Redmond was Creative Director  
21 and Founder of THE NOWHOUSE at The San Francisco Giants Stadium. Scott has led numerous  
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(San Francisco Market Rate) donated to Gavin Newsom and The City Of San Francisco by Scott and his Team. Scott has produced multiple high-tech demonstration home projects for public and industry showcases. Scott has created multiple patented technologies for safe, non-toxic, efficient construction.

#### PROFESSIONAL MEMBERSHIPS:

- \* National Computer Graphics Association
- \* Association Internationale du Film D`Animation
- \* Washington Research Institute
- \* Society For Information Display
- \* Optical Society of America
- \* American Society for Industrial Security
- \* American Institute of Physics
- \* Illuminating Engineering Society of North America
- \* American Film Institute,
- \* Association for Computing Machinery- SIGGRAPH, SIGCHI
- \* International Society for Arts, Science and Technology
- \* Who's Who in the World
- \* PGI, NAEM, IAFE, CALI, INEOA, NAUI, ASTM, IAAPA, TEA.

#### PRODUCTS, PROPERTIES, AND LICENSES:

- \* Envirosphere(tm)

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- |    |                            |
|----|----------------------------|
| 1  | * Reality Port(tm)         |
| 2  | * Marquee Magic(tm)        |
| 3  | * Cloudpainting(tm)        |
| 4  | * Lightgrid(tm)            |
| 5  | * Lights(tm)               |
| 6  | * LightsII(tm)             |
| 7  | * Snowlight(tm)            |
| 8  | * Snow Thruster(tm)        |
| 9  | * RigRibbon(tm)            |
| 10 | * Earthstar(tm)            |
| 11 | * Footstock(tm)            |
| 12 | * Motivation(tm)           |
| 13 | * Plasteel(tm)             |
| 14 | * Televid(tm)              |
| 15 | * Promobots(tm)            |
| 16 | * Paris Rhythm Section(tm) |
| 17 | * Playamid(tm)             |
| 18 | * Softsquare(tm)           |
| 19 | * Pyrograph(tm)            |
| 20 | * Sky Grid(tm)             |
| 21 | * Pyro-Electronics(tm)     |
| 22 | * Glitteroons(tm)          |
| 23 | * Tentographics(tm)        |
| 24 | * Windseine(tm)            |
| 25 | * The Light Concert(tm)    |
| 26 | * Sky Parade(tm)           |
| 27 | * Wind Vixen(tm)           |
| 28 | * SE5(tm)                  |

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- 1 \* Heli-grid(tm)
- 2 \* Cyberchair(tm)
- 3 \* Reality Chamber(tm)
- 4 \* Steelcloud(tm)
- 5 \* Spiritphone(tm)
- 6 \* Farpoint Verity Vision(tm)
- 7 \* Medport(tm)
- 8 \* Cybercycle(tm)
- 9 \* Directvision(tm)
- 10 \* Shapewall(tm)
- 11 \* Phasegrid(tm)

12  
13  
14 =====  
15 =====  
16 =====

17  
18 HISTORIC LEGAL AND INVESTIGATIONS CASE TIMELINES -  
19

- 20
- 21 • 1978 Mayor Dianne Feinstein and other senior city officials issue proclamations and
  - 22 letters of acclaim for Scott Redmond's accomplishments.
  - 23 • 1979 Daughter of Dianne Feinstein stays at Scott Redmond's house on numerous
  - 24 occasions, Her best friend is Scott's room-mate, disclosing unsavory activities of her mother.
  - 25 • 1980 Clever Industries' begins first inflatable & car projects. Builds over 100 major
  - 26 inflatable projects.
  - 27 • 1987 Redmond runs mayoral campaign against two parties who are supported by Dianne
  - 28 Feinstein. The other parties are charged with corruption by local newspapers. Feinstein promises

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1 retribution. Feinstein orders Supervisor Carol Ruth Silver to : “take him out” politically and career-  
 2 wise Silver reveals to Redmond. Of the targets that Redmond is up against. One is removed from  
 3 public office permanently. One is placed in Federal prison. Both are placed under long term law  
 4 enforcement surveillance.

- 5 • 1995 Clever Industries develops solid state energy storage solution
- 6 • 2002 Energy Storage Patents filed, Issued 2006
- 7 • 2002 Fuel Cassette® Patents Filed, Issued 2008
- 8 • 2005 DOE Grants project \$1,200,000 value/\$895,000 cash to help reduce America’s  
 9 dependence on oil in Iraq War Bill
- 10 • 2006 Vehicle project formed for car project and power plant production effort split off  
 11 for vehicle to become Limnia.
- 12 • 2006 Clever Industries, LLC organizes extension of Scott Redmond’s associated patents  
 13 \$100,000,000+ of IP and cash and services for project collateral.
- 14 • 2006- Ford, GM & Chrysler begin to receive reports from their financial departments  
 15 that distributor and UAW contracts are crushing their revenue streams beyond a pre-set margin-of-  
 16 tolerable-profit-reduction.
- 17 • X Prize group first discusses potential automotive XPrize.
- 18 • Oct. 15, 2006 [www.xpcarteam.com](http://www.xpcarteam.com) URL created by our project.
- 19 • April 11, 2007 On Scott Redmond’s birthday, Automotive XPRIZE officially  
 20 announced. XP states that they intend to enter.
- 21 • 2008 MOU signed with Limnia/FST for all stock acquisition upon DOE funding.
- 22 • Sept. 2008- XP advised of Section 136 funding by Pelosi and Boxer offices. Staff advise  
 23 XP to only apply for \$45M right now because “GM, FORD & CHRYSLER have the rest of the  
 24 money hardwired for themselves”. XP needs \$100M but Pelosi says they will get another \$25B for  
 25 ATVM in the next congressional cycle.
- 26 • 2008- ATVM program is funded for \$25B.
- 27 • In October of 2008 we were informed by Barbara Boxer’s office that the Section 136  
 28 ATVM loan program was about to be released for application. We had our full application

1 submitted to the ATVM program within days of the opening announcement and were informed we  
2 were the first applicant by ATVM staff.

3 • In late November we attended an approx. 15 minute meeting at the DOE ATVM office  
4 in Washington DC after flying 4 people there at our expense in which we turned over a massive  
5 stack of customer letters of support, which was eventually lost by DOE. We asked if they needed  
6 any information or needed to talk to us for any additional information and they said no.

7 • Scott attended a group presentation by DOE on DEC. 1 which was videotaped and in  
8 which DOE staff contradicted each other on those tapes.

9 • On 12/10/08 – met with Melanie Nutter at Nancy Pelosi’s office she said she would  
10 inquire on the status but was unable to get DOE to provide information.

11 • On 5/28/09 met with Jason Gerbsman, the DOE CFO’s aid for 30 minutes in  
12 Washington DC in which we were told by the DOE CFO’s aid that everything was in order,  
13 Everything looked good and we appeared to be fully compliant and passed technical review.

14 • Our office made at least 20 phone calls and sent over 20 emails over the last year asking  
15 if any additional information could be provided and when technical or production reviews might  
16 take place that we needed to plan scheduling for as we were informed that Fisker, A123, Enerdel,  
17 Tesla and a number of other applicants who had applied months later than we had were already  
18 deeply in those kinds of meetings and interviews. At one point we were told by Brent Peterson that  
19 our application was small and simple enough that we did not require such extensive review.

20 • In early February, 2009, we were informed by Nancy Pelosi’s office that the Loan  
21 Guarantee program existed and that we appeared to meet the criteria for successful application.

22 • We emailed the Loan Guarantee program stating our intent for our energy group to  
23 apply and confirming if the program was still intact.

24 • After research it appeared that the application fees were prohibitive and we inquired  
25 about that..

26 • We were then invited to attend, virtually, via webcam a senate energy committee  
27 hearing chaired by Senator Bingaman in which dramatic changes and repairs to the program were  
28 discussed as intended actions including waiving the fees and in which the loan program was

1 admonished by consultants brought in by the committee for problematic management and fees and  
2 process structured in an exclusionary manner. Videotape of this testimony is available on the Senate  
3 Committee website.

4 • We were then invited to a conference call with John Podesta, Steven Chu and Ken  
5 Salazar in which Mr. Chu stated his intention to waive the application fees. Audio tape of this  
6 evidence is available.

7 • A number of news stories were then published stating the intention of Mr. Chu to waive  
8 the fees.

9 • We then submitted our application with a cover letter stating that we understood that Mr.  
10 Chu was waiving the application fees.

11 • We then received a call from Myrtle Gross of DOE on Feb. 26 stating that we did need  
12 to pay the fees and that we needed to wire money by midnight Feb. 26. We contacted a few new  
13 investor leads to source the funds for this but they were unable to turn around the funding request  
14 on short notice. Our cash investor to-date IS DOE, thus we had hoped, in addition to Mr. Chu's  
15 waiver intention, to also receive an investment of the fees by DOE.

16 • On Feb. 27 we assumed we had missed the deadline but we then received a call from  
17 Linda Baultal (sp?) of DOE stating that there was a few days flexibility so we reinitiated the  
18 investor search for the application fees. We then received a call from Dan Tobin who reconfirmed  
19 some flexibility on the time to wire the money and we reconfirmed that our investor search was  
20 continuing.

21 • Our investor liaison, Stephen Lasser, then found multiple possible sources of funding for  
22 the fees, but the investors required the response to a few questions from DOE. 6+ phone calls were  
23 placed to DOE by Stephen Lasser, who is working with Limnia on behalf of a group of investors,  
24 others by myself and associates, but his calls have not yet been returned. Without the feedback  
25 from DOE to Mr. Lasser and thus to the investors, Limnia is in "hold" mode. The last  
26 communication was a call between Mr. Lasser and Dan Tobin, weeks ago, in which Mr. Tobin  
27 promised to review the application and respond re: initial applicability. This was the call that the  
28 investors were waiting for in order to release funds. We now find that the promised call was in fact



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1 intentionally not made until after the deadline had passed on orders from Lachlan Seward to Dan  
2 Tobin.

3 • Our energy group also submitted an additional ATVM loan application for our battery  
4 technology on 2/1/09. This other ATVM application was rejected twice for reasons that were totally  
5 inapplicable particularly because, according to Lachlan Seward: “The technology did not apply to  
6 electric cars”, when, in fact the technology had been funded in part by DOE SPECIFICALLY for  
7 electric cars, was noted in the IRAQ WAR BILL by congress as being for electric cars, had issued  
8 US Patents on it for electric cars and specifically stated in the application that it was for electric  
9 cars.

10 • We are now informed that a decision on Aptera, XP Vehicles, ECO-Motors and a  
11 number of other smaller companies had been made back in December by ATVM staff to not fund  
12 any of the companies who’s “political consequences” were minimal. It appears that only big  
13 contributors or those backed by big contributors got fair consideration. Brent Peterson stated that  
14 the reviews and considerations had been conducted far earlier in the year. This amounts to  
15 misrepresentation by causing the companies to extend risk, liability and payment promises based on  
16 “reasonable expectations and promises” which certain DOE staff knew that they had already  
17 negated.

18 • 2008- XP is the first to enter application for ATVM loan.

19 • 2008- Detroit big 3 realize that 2 clauses in Section 136 bill could allow competing and  
20 electric car companies, not in Detroit, to get funded. They send their lobbyists on a war to pull the  
21 money from ATVM program and put it into TARP so they can get it as an easy hand-over via  
22 TARP. Big late night fight (on CNN) over this goes back and forth in Congress and ATVM gets to  
23 keep the money at the last minute due to a missed phone call between lobby group and GM.

24 • 2008- Limnia enters Loan guarantee application. This is the second of the team’s 3  
25 applications.

26 • 200X- Limnia enters ATVM application. This is the 3rd of the team’s 3 applications.

27 • Dec. 2008- XP group goes to Washington DC to meet with DOE, senate &  
28 congressional representatives.

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1 • Dec. 2008- In meeting at DOE HQ in front of applicants, press and industry leaders.  
2 Scott Redmond questions Lachlan Seward on ATVM rules which do not seem to make sense.  
3 Seward is unhappy with this being discussed. Transcript of session and videotape of session show  
4 two different experiences. (Videotape needs to be subpoenaed.)

5 • Dec. 2008- XP group goes to Washington DC again to meet with DOE, senate &  
6 congressional representatives.

7 • Dec. 2008- Lachlan Seward states to certain of his staff that XP is “Not getting any  
8 funding from here”.. and that it will be “a cold day in hell when they get ATVM money..”

9 • Dec. 31, 2008- The date by which the \$25B was supposed to have been dispersed per  
10 Detroit’s emergency financial need as originally set in the drafting of the Section 136 ATVM bill.  
11 Detroit is taken aback by clause inserted in ATVM at last minute that you can’t get the funding if  
12 you are considering bankruptcy. They adopt the tactic: “if we can’t get it, nobody else will either”  
13 according to DOE staff friendly to XP. Based on assertions by Senate & congressional staff, U.S.  
14 Attorney’s and U.S. law scholars, and DOE staff, per the reading of Section 136, XP expected funds  
15 to arrive by Dec. 31 or at least by Jan. 20, 2009. XP maintained operations at a level equal to the  
16 expectation based on assertions from those parties for over 8 months and, thus, felt “hoodwinked”  
17 by those assertions which caused substantial economic harm to XP.

18 • Sandia National Laboratory agrees to work with XP and supplies letter proving XP  
19 power plant technology to be leading solution worldwide.

20 • Jan. 2009- 23 applicants submit “Substantially Complete” ATVM applications and only  
21 5 of them are car companies, the rest are parts suppliers. (see Seward interview with Parts supplier  
22 confirming this) DOE tells congress that if Banks can review commercial loans in 4 weeks then  
23 they can review 5 car company applications in the same time period. Detroit orders lobbyists to  
24 order their connections to delay the loans until the applicants go out of business.

25 • XP places multiple calls to Carol B. at DOE and others asking how XP can assist in the  
26 technical review. XP is told the technical review on XP is “complete”. XP asks how that could be  
27 when nobody from DOE every contacted any technical staff at XP.

28 • XP receives a letter from DOE stating that its ATVM application is “Substantially

1 Complete”.

2 • Limnia electric car power plant application for Loan Guarantee program is stonewalled  
3 by Tobin at DOE on orders from Seward at DOE ATVM program. Tobin refuses to reply as  
4 promised until after payment deadline has passed, thus cutting off the project from funding via that  
5 route. Matt Rogers and Steve Spinner at DOE direct Tobin to avoid XP related funding because XP  
6 has filed complaints with the Senate Committee on Environment, the overseers of the DOE.

7 • XP places multiple calls to Steve Rattner at White House. He states that he has no  
8 intention of assisting anyone but the Detroit big 3. Rattner directs Seward on a weekly basis.  
9 Seward is shown at White House in White House logs on multiple occasions with Rattner.

10 • Jan. 2009- Venture Capital groups agree to not issue any term sheets for ATVM  
11 applicants until after they see the DOE term sheet. This gives DOE the power to kill off any car  
12 company it wants to by an interminable delay process. Tesla’s former head of Marketing publishes  
13 an opus calling out DOE for blocking funding for electric car companies. (Remember that this is at  
14 the peak of the recession)

15 • Jan. 2009- ATVM Director Lachlan Seward assigns DOE staff to walk Fisker, Tesla,  
16 Ford, Nissan and certain other applicants, who had paid many millions of dollars in lobby fees,  
17 through the process by going to their facilities, guiding them in one on one meetings at DOE and  
18 otherwise handholding them through the process. All of these applicants applied much later in the  
19 process and did not even have a design in most cases. A subpoena of the state-of-design of each of  
20 the companies as of Jan. 15, 2009 will demonstrate the favoritized process.

21 • Dianne Feinstein’s husband has multiple charges filed against him by multiple  
22 newspapers involving multiple insider deals including electric car battery materials efforts.

23 • March 2009- DOE ATVM office issues press release stating that they will not review  
24 applications on first-come/first-served basis as stated in all DOE literature but will now change the  
25 rules to review in the order they desire. Appears to be violation of the Section 136 law.

26 • Scott Redmond visits DOE HQ to see what else the project can do to assist the closure  
27 of the loan and is told by DOE staff that they have “had everything they need for quite some time”.

28 • For over a year XP is told every week by DOE staff: “we should be able to announce

1 you any day now...”

2 • XP receives another letter from DOE on its ATVM loan application stating that it’s  
3 application was again “Substantially Complete” a year later. Ignoring the fact that DOE had already  
4 told XP, formally, in writing, that it’s application was “substantially complete” a year earlier. The  
5 letter goes on to reject XP’s loan. When XP calls for an explanation it is told that the vehicle  
6 proposed by XP was not using enough gasoline.

7 • Toyota & GM announce they will sever partnership in NUMMI autoplant in Fremont,  
8 CA. XP contacts senior officials at Toyota & NUMMI the same day and begins discussion of JV to  
9 restart NUMMI with an XP build. Feinstein’s office intercedes and says they have deal in place  
10 already and discourages XP from moving forward. Feinstein subsequently announces they have  
11 made a deal with XP competitors Tesla to take over the plant.

12 • GAO releases investigation report confirming favoritism and rigged process.

13 • Jan. 2010- Lachan Seward states that delays in processing applications had been due to  
14 “hundreds of car companies who had applied”, yet in the first cycle only 5 car company applicants  
15 existed and Lachlan Seward took millions of dollars for his own department to pay or “application  
16 processing expenses” for those applications; an amount which is 40 times greater than the cost any  
17 commercial bank has spent on processing any commercial loan application, in history.

18 • Oct. 2010- XP sends its notes and concerns to Eric Holder’s office at DOJ.

19 • Nov. 2010- Multiple media journals accuse groups of venture capital companies of  
20 working with certain DOE officials to rig the recipients of the funding in ways that will benefit their  
21 materials, battery and political investments.

22 • Nov. 2010- Multiple media journals contact XP re: “Major investigations” of the auto  
23 funding process that they are working on.

24 • Nov. 2010- DOE’s showcase Section 136 Company Solyndra begins to fail as CEO  
25 leaves, Staff is fired and factory is downsized. This is a \$500M+ by the DOE ATVM/Loan group  
26 headed by Seward and demonstrating that DOE waived companies with no potential through and  
27 bypassed those who did. This failure invalidates the “careful and precise review” that DOE ATVM  
28 and Loan Guarantee staff state they engaged in for applicants. Feinstein was the core sponsor of

1 Solyndra.

2 • Nov. 2010- White House states that Detroit has lost over \$17B from the car funding.  
3 The money is either unaccounted for, or lost, in that the Detroit big 3 have stated they will not pay  
4 back the loans. 10% of that lost money would have funded every non-Detroit applicant.

5 • Nov. 2010- To date, no applicant has yet to deliver a superior vehicle proposal re: price,  
6 range, safety, technology, lower G&A, Higher ROI, more publicly accessible, easier to repair,  
7 etc....

8  
9 =====

10  
11 IN-Q-TEL 'DIRTY TRICKS' AND INTERFERENCE CASE TIMELINE  
12

13  
14 2007- IQT "W" and "Z" contact us under the pretext of "providing funding" if they can  
15 review some of our patent-filed technology. They say they see no use for it and decline. Extensive  
16 technical documents are acquired, under confidentiality, by "W".  
17

18 2009- Duplicates of some of our technology is funded and launched. We find out later it was  
19 secretly funded by "W" and "Z"

20  
21 2009- We file first federal complaint for theft but do not realize that part of effort involves  
22 "W" and "Z" yet.  
23

24 2010- "W" and "Z" again contact us under the pretext of "providing funding" if they can  
25 review some of our patent-filed technology. They say they see no use for it and decline.  
26

27 2011- "W" and "Z" Duplicates of some of our technology is funded and launched by  
28 someone. We find out later it was secretly funded, in part, by "W" and "Z". Two federal lawsuits are

1 now underway against associates of "W", "X", "Y" and "Z" but all of the connections have not been  
2 disclosed to us yet.

3  
4 2013- "W" again copies a technology we deployed in 2006.

5  
6 2014- Private investigators, federal investigators, media investigators and tipsters disclose  
7 how all of the defendants are actually related. We report it to federal law enforcement and discover  
8 that multiple IQT aircraft have been intercepted by DEA with over four tons of cocaine on-board,  
9 that IQT claims to be a "charity" and that IQT has sold 'dirty tricks' services to politicians, The  
10 American Chamber of Commerce and other non-charity entities.

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13 =====  
14 =====  
15 =====

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17  
18 SONY PICTURES WORK, RIP-OFF AND HACK CASE TIMELINE

19  
20 \* January 7, 1999 - NDA Executed with Sony Pictures

21  
22 \* January 12, 1999 - NDA executed with Sony Electronics Inc.

23  
24 \* January 1999 - One of multiple NDA's were signed with SONY prior to the main Sony  
25 Board meeting where Scott presented internet video as sole speaker

26  
27 \* In January 1999 - TSNB was asked present to one of the largest corporate meetings Sony  
28 had ever called. VP's were walking in and shaking each others hands and commenting: "oh, I've

1 read about you in Variety"" Ira Rubenstein said that they " had never had so many VP's and  
2 department heads from so many continents in one room..". Attendees included but were not limited  
3 to most of the top level executives from Sony U.S. and Sony Japan. At this meeting TSNB  
4 demonstrated hardware, IP set-up box, portable PDA, software and architecture, under NDA, for an  
5 entire VOD internet, cable and satellite IP based digital media technology, all of which Sony is  
6 using today. In the building we met Mark Gray, one of the names on the patent and a future  
7 advocate of the "Passage"" product from Sony:

8  
9 Mark C. Gray - Chairman, President & Chief Executive Officer - Kasenna, Inc. Mr. Gray  
10 joined Kasenna after a successful tenure with Pluto Technologies, a manufacturer of standard and  
11 high definition digital video server products, where he was founder, Chairman, and CEO. He served  
12 in this capacity until September 2000 when the company was acquired by Avid Technology, Inc.  
13 Prior to that, he served as Chairman, President, and CEO of Chyron Corporation, a publicly traded  
14 corporation listed on the New York Stock Exchange. From August 1989 through June 1993, Mr.  
15 Gray held several senior executive positions at Sony Corporation of America, starting as President  
16 of the Computer Peripherals Systems Company. In April 1990, he became President of Sony  
17 Communications Products Company, which included Sony Broadcast and Sony Pro-Products  
18 divisions. At the time of his departure from Sony, he served as Executive Vice President and  
19 General Manager of the Business and Professional Group, which included all Sony professional  
20 electronics companies. From 1986 through 1989, Mr. Gray was Executive Vice President and Chief  
21 Operating Officer of Pinnacle Systems Inc., which subsequently made a successful public offering.  
22 Prior to 1986, he was General Manager of the Studio Products Division of Ampex Corporation  
23 having spent previous years with the Harris Corporation and Tektronix, Inc. His career in broadcast  
24 electronics followed a successful career in television production and he was responsible for many  
25 programs that won numerous awards and honors including three Emmys. Mr. Gray holds a  
26 Bachelor of Science Degree in Electrical Engineering from the University of Tennessee, a Master of  
27 Arts Degree in Communication from St. Louis University,  
28 and is a graduate of the School of Executive Development of the Babson College graduate

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1 school of business.

2  
3  
4 \* In January of 1999 - TSBN was asked by Sony to present at The Sony Technology  
5 Building, In attendance were Sony's top technology heads, who admitted they had not figured out  
6 how to do a video-on-demand web service.

7  
8  
9 \* March 10, 1999 - At the main Hollywood event that year, Ira Rubenstein as VP Sony  
10 made the following statement in front of a live audience and live cameras: "The future of the movies  
11 is on the internet and it will be brought to you by Sony Pictures and TSBN who is standing in the  
12 back of the room""

13  
14  
15 \* March 22, 1999 - Sony sends agreement to have us test one of their feature films with our  
16 technology.

17  
18  
19 \* April 15, 1999 - TSBN receives the following threat letter from the Senior Sony attorney  
20 who was present at the core presentation TSBN did. The attorney has not realized that it was Ira  
21 Rubenstein, their own leader, who had blown the information in public at the Variety show above.  
22 Sony actually breached their NDA by making these statements in public. He responded demanding  
23 to know who said it from his company. Ira Rubenstein begged us not to say he said it. Ira said he  
24 was our "insider" and our "Buddy" and he would protect us if we protected him!!!!!!!

25  
26  
27 \* Feb. 16, 2000 - Ira Rubenstein, The Supposed "INVENTOR" on Sony's patent sends  
28 another email advising that he is incapable of using computers. One must ask, If Ira is so



1 technologically challenged, how could he have invented one of the leading internet technologies?

2  
3  
4 \* June 21, 2000 - Sony's Larry Hess sends us a letter notifying his departure, He has kept in  
5 touch with us in at least two phone calls to advise that we should "watch our ass.. Sony is not  
6 respectable in these matters""

7  
8  
9 \* July 25, 2000 - Takashi contacts TSBN to discuss the media device we presented at the  
10 January meeting. As we now know, Sony's PSP is all about VOD on a handheld:

11  
12  
13 \* Nov. 9, 2000 - Sony Music VC group asks Scott to visit their SF offices to "tell them some  
14 of his ideas.."

15  
16  
17 \* Dec. 28, 2000 - Sony VC group discuss investing, asks us for technology update.

18  
19  
20 \* Also in December of 2000 Sony tests a set-top box in a highly secret test with over 2000  
21 consumers in CableVisions Systems New York Market. Larry Hess advises that the box is the same  
22 or identical to that we showed.

23  
24  
25 \* Aug. 17, 2001 - Afterdawn.com reports that it was Sony who developed all of the  
26 technology for MovieFly/MovieLink

1           \* January 2002 - Sony sells the core VOD technology solution to In-Demand to be used for  
2 their VOD system

3  
4  
5           \* Feb. 11, 2002 - Sony Pictures Launches New Online Promotions Unit Culver City, Calif.  
6 -- Sony Pictures Digital Entertainment on Monday announced the launch of a new unit, Sony  
7 Pictures Integrated Network (SPIN), which will develop promotions for the company's film,  
8 television and home entertainment properties. The new unit will also oversee the development and  
9 operation of all of Sony Pictures Entertainment's. Previously, Rubenstein directed the development  
10 of Sony's Moviefly (now known as Movielink) video-on-demand joint venture, and was vice  
11 president of marketing for Columbia TriStar Interactive.

12           [http://biz.yahoo.com/prnews/020208/laf061\\_1.html](http://biz.yahoo.com/prnews/020208/laf061_1.html)  
13

14           \* March 1, 2003 - Cable & Satellite International publishes article on Sony "Passage"  
15 product. "Rite of Passage: Sony Lays Down Cable's Future" - "Question: When is MPEG not  
16 MPEG? Answer: When it is an encryption technology and not just a compression tool.

17           This distinction is at the heart of Sony's new Passage cable network system. Some are  
18 calling this the "Holy Grail" of the cable world. a pretty strong characterization, but one that may  
19 well be true. By leveraging MPEG not just for compression but also for encryption, Sony aims to  
20 revolutionize the cable industry, something that is desperately needed. Passage will allow cable  
21 operators to offer new services, including video-on-demand (VOD), without having to do a "fork-  
22 lift" upgrade of their systems. Rather, Passage works right alongside their existing cable network  
23 protocols to offer new services while still delivering the same services to existing set-top boxes  
24 (STBs). In the past, all cable networks were essentially one of two proprietary systems. Motorola or  
25 Scientific Atlanta. Unfortunately, those companies weren't opening up to new and alternative  
26 services fast enough, nor were prices dropping without competition. For example, although TiVo-  
27 style PVRs have been around for several years and available from the satellite companies for even  
28 longer, cable only this year got a PVR for its networks, and even that was rather plain-Jane. The

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1 cable industry tried to respond with their OpenCable initiative, but this was a "vanilla" offering  
2 based in part on a combination of these two proprietary solutions with some badly needed  
3 enhancements..."

4  
5 \* Nov. 11, 2004 - Sony generates revenue selling VOD technology via MovieCo in Europe,  
6 of which it is a co-owner

7  
8 \* Aug. 26, 2005 -Sony Provides VOD technology and content to ntl's European VOD effort.  
9 Sony is generating revenue from VOD

10  
11 \* April 4, 2006 - Press reports that Sony has been selling a movie on demand service to  
12 corporations for at least years with the brand name of : "Passage"". Sony is generating revenue from  
13 VOD.

14  
15 \* April 4, 2006 - Patent # 7,024,466 is issued to Sony via its owned entity MovieLink, with  
16 the inventors listed as: Outten; Todd Avery (Los Angeles, CA); Spaulding; Bryan Gentry (San  
17 Francisco, CA); Sherr; Scott Jeffrey (Brentwood, CA); Rubenstein; Ira Steven (Los Angeles, CA);  
18 Landau; Yair (Pacific Palisades, CA); Chey; Douglas Daiseung (Santa Monica, CA); Arrieta;  
19 Michael R. (Rolling Hills Estates, CA); Mandyam; Harish (Playa del Rey, CA); Rodriguez; Thomas  
20 M. (Culver City, CA).. almost all of whom were either in the TSNB presentation in January 1999 or  
21 had staff in the room. The patent was filed April 6, 2001 using technology and teachings Scott  
22 provided to Sony under NDA!

23  
24 \* April 24, 2006 - Sony Corporation and bitWallet, Inc. show an IP set top box identical to  
25 that shown by TSNB in 1999 meeting.

26  
27 \* Jan. 1, 2007 - As of this date, in the entire patent file wrapper for Sony Pictures patent the  
28 ONLY third party name mentioned and acknowledged as a source of information, in the federal

1 government file dockets, is Scott Redmond and TSNB.

2  
3 \* July 15, 2008 - Sony announces PS3 movie download service - Company also reveals 80-  
4 gigabyte PS3 model for \$399 - MSNBC News Services - updated 2:57 p.m. PT, Tues., July. 15,  
5 2008 - LOS ANGELES - Sony is raising the curtain on a PlayStation 3 movie download service. "  
6 The company announced at the E3 Business and Media Summit it will launch a downloadable  
7 movie service Tuesday featuring films from such studios as Disney, Fox and Warner Bros. The  
8 standard and high definition videos can be downloaded to the console and transferred to a  
9 PlayStation Portable. Rentals will cost \$2.99 to \$5.99. Purchases will cost \$9.99 to \$14.99.

10 Sony also announced it will sell an 80-gigabyte PS3 model for \$399 beginning in  
11 September. Among the new games revealed were "God of War III" and "Massive Action Game,"  
12 which will allow up to 256 players to battle online. Sony said on Tuesday that it was "well on its  
13 way" to meeting its goal of selling 10 million PlayStation 3 units worldwide in its current fiscal year  
14 ending March. Sony Computer Entertainment America President Jack Tretton said it was also on  
15 target to meet its goal of selling 15 million units of its handheld PSP in Sony's business year ending  
16 March 31, 2009."

17  
18 \* This is a global, full retail VOD system using every component revealed to Sony by  
19 TSNB. SONY VUE was what Scott had designed for SONY that HE NEVER GOT PAID FOR!

20  
21 \* January 7, 2008 - Digital Hollywood Events at CES, Monday, January 7th, 1:30 PM - 2:30  
22 PM, Session B - DH3 - Digital Hollywood -

23 Ira Rubenstein Spoke at This event - Ira Rubenstein, Executive Vice President, Sony  
24 Pictures Digital: Ira Rubenstein has built a career on identifying and implementing new marketing  
25 and distribution tactics for entertainment properties through interactive, online and mobile  
26 initiatives. As executive vice president of Sony Pictures Digital, Rubenstein is responsible for  
27 overseeing the division's production efforts to extend Sony Pictures properties into the digital  
28 marketplace through SonyPictures.com, mobile games and personalization products, casual games,

1 and innovative strategic partnerships. Rubenstein manages the digital growth of the studio's most  
2 important brands including Wheel of Fortune and Jeopardy! as these and other properties have  
3 progressed through various platforms including broadband, interactive television, mobile, and  
4 emerging platforms such as the PSP and PS3. Most recently, Rubenstein's team launched a full suite  
5 of digital products on behalf of two of Columbia Pictures' most highly anticipated films - THE DA  
6 VINCI CODE and CASINO ROYALE. In addition, Rubenstein oversees production for all Sony  
7 Pictures properties breaking into the growing mobile marketplace. His team has developed an array  
8 of successful mobile entertainment offerings such as the award-winning games Ratchet and Clank:  
9 Going Mobile and Spider-Man 2: The Hero Returns, retro titles such as Elevator Action and Q\*Bert  
10 and personalization products for "The Boondocks." Under Rubenstein's leadership,  
11 SonyPictures.com generates online awareness for the studio's film, television, and home  
12 entertainment properties by driving traffic with partnership marketing, media buys, community  
13 building, e-commerce, auctions, games and original content. Prior to his role as executive vice  
14 president, Rubenstein was senior vice president and directed the division's brand integration and  
15 sponsorship strategies and was also responsible for the production and creative direction for  
16 SonyPictures.com. Beginning in 2000, Rubenstein oversaw the establishment of Sony Pictures  
17 Digital Entertainment's on-demand movie initiative to offer theatrically released motion pictures via  
18 digital delivery for broadband Internet users. From concept to working technical trials, Rubenstein  
19 directed the project (developed under the name Moviefly), which ultimately became Movielink, a  
20 groundbreaking partnership among five studios. More recently, Rubenstein helped to develop Sony  
21 Pictures Digital's "Movies on Memory Cards" initiative in Europe. Several films, including  
22 SPIDER-MAN<sup>TM</sup> 2, MONTY PYTHON AND THE HOLY GRAIL, HITCH, GHOSTBUSTERS,  
23 CHARLIE'S ANGELS: FULL THROTTLE and STUART LITTLE are now available on memory  
24 cards to view on mobile phones. Before the establishment of Sony Pictures Digital Entertainment,  
25 Rubenstein was vice president, marketing, Columbia TriStar Interactive. In this role, he managed  
26 the strategic implementation of media planning, promotional and creative advertising campaigns for  
27 more than 100 film sites including STUART LITTLE, MEN IN BLACK, AIR FORCE ONE, AS  
28 GOOD AS IT GETS and THE MASK OF ZORRO. Recognition for his work includes Webby

1 Awards, Mobie awards, a Gold Clio and The Hollywood Reporter Key Art award. Before joining  
2 Columbia TriStar Interactive, Rubenstein served as manager of media research and interactive  
3 marketing for Twentieth Century Fox. Rubenstein was recently included on the highly regarded  
4 "Digital 50" list, a distinction given to fifty new media innovators by The Producers Guild of  
5 America's New Media Council and The Hollywood Reporter. He is a graduate of the Peter Stark  
6 Producing Program at USC.

7  
8  
9 \* April 25, 2008 : Marvel Comics hires former Sony exec as digital media VP. Marvel  
10 Comics has announced the hiring of Ira Rubenstein, a 12-year vet of Sony Pictures where he  
11 oversaw digital distribution, casual and mobile games including properties such as Jeopardy! and  
12 Wheel of Fortune, as well as mobile titles like Spider-Man 2: The Hero Returns and Ratchet and  
13 Clank: Going Mobile. His new role will be much the same as the executive vice president of Global  
14 Digital Media at Marvel, where he'll handle digital distribution of content across across all  
15 platforms, as well as lead Marvel's charge into mobile and casual games -- meaning we'll know  
16 where to place the blame when someday we're coordinating the drapes in Stark Tower from our  
17 mobile phones.

18  
19  
20 \* Aug. 22, 2008 - Reported as speaker Bio - Ira Rubenstein - EVP, Global Digital Media  
21 Group - Marvel Entertainment, Inc. - Ira Rubenstein has built a career on identifying and  
22 implementing new marketing and distribution opportunities for entertainment across a wide array of  
23 platforms. In his role at Marvel Rubenstein is responsible for the company's Global digital strategy  
24 and implementation for all of Marvel's properties across digital and games channels. Prior to  
25 Marvel, Rubenstein spent 12 years with Sony, most recently as executive vice president of Sony  
26 Pictures Digital where he was responsible for overseeing the division's production efforts to extend  
27 Sony Pictures properties into the digital marketplace through SonyPictures.com, mobile games and  
28 personalization products, casual games, and innovative strategic partnerships. Rubenstein managed

1 the digital growth of the studio's most important brands including Wheel of Fortune and Jeopardy! -  
2 leading the expansion of these properties into broadband, interactive television, mobile, and the PSP  
3 and PS3 platforms. In addition, Rubenstein oversaw production for all Sony Pictures properties  
4 breaking into the growing mobile marketplace, developing an array of successful mobile  
5 entertainment offerings including the award-winning Spider-Man 2: The Hero Returns and Ratchet  
6 and Clank: Going Mobile, as well as the first Movies for Mobile Phones on Memory Cards. Also  
7 during his tenure at Sony, Rubenstein oversaw the establishment of Sony Pictures Digital  
8 Entertainment's on-demand movie initiative, Movielink, to offer theatrically released motion  
9 pictures via digital delivery for broadband Internet users. Before the establishment of Sony Pictures  
10 Digital Entertainment, Rubenstein was vice president, marketing, Columbia TriStar Interactive. In  
11 this role, he managed the strategic implementation of media planning, promotional and creative  
12 advertising campaigns for more than 100 film sites. Before joining Columbia TriStar Interactive,  
13 Rubenstein worked in film research and new media for Twentieth Century Fox. Rubenstein was  
14 recently included on the highly regarded "Digital 50" list, a distinction given to fifty new media  
15 innovators by The Producers Guild of America's New Media Council. Recognition for his work also  
16 includes Webby Awards, a Mobie award for games, a Gold Clio and several Key Art Awards.  
17 Rubenstein holds a B.A. in Management Science from UC San Diego and is a graduate of the Peter  
18 Stark Producing Program at USC.

19  
20 \* On November 24, 2014, a hacker group identifying itself as "Guardians of Peace" leaked a  
21 release of confidential data from the film studio Sony Pictures. The data included personal  
22 information about Sony Pictures employees and their families, emails between employees,  
23 information about executive salaries at the company, copies of then-unreleased Sony films, plans  
24 for future Sony films, scripts for certain films, and other information.[1] The perpetrators then  
25 employed a variant of the Shamoon wiper malware to erase Sony's computer infrastructure.[2]. The  
26 dumped data proves that Sony was a lying pack of theiving scumbags. The entire file set is still  
27 held, by multiple third parties, from mobsters to government agencies; and could pop-up, when  
28 needed, in any big trial or 60 Minutes-type investigation.

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#### THE MODERN POLITICAL CORRUPTION TIMELINE IN THE MAIN CASE

December, 2008 - Obama and his Chicago mobsters set-up attacks on reporters and whistle-blowers exposing their stock market and energy industry manipulation schemes.

January 21, 2009: President Obama takes office; pledges unprecedented transparency. Orders secret hit-jobs on whistle-blowers including cutting of their SSA, HUD, and other benefits and killing their federal funding.

April 2009: Someone leaks the unmasked name of Congresswoman Jane Harman to the press. According to news reports, the Bush administration NSA incidentally recorded and saved Harman’s phone conversations with pro-Israel lobbyists who were under investigation for espionage. The story is first broken by Congressional Quarterly’s Jeff Stein.

December 17, 2009: The Obama administration prosecutes FBI contractor Shamai Leibowitz for leaking documents to the media in April 2009. Leibowitz says he leaked because he felt FBI practices were “an abuse of power and a violation of the law” which he reported to his superiors at the FBI “who did nothing about them.” (According to the ACLU: “Amazingly, the



1 sentencing judge said, ‘I don’t know what was divulged other than some documents, and how it  
2 compromised things, I have no idea’.”)

3  
4 2010: The IRS secretly begins “targeting” conservative groups that are seeking nonprofit  
5 tax-exempt status, by singling out ones that have “Tea Party” or “Patriot” in their names. Army  
6 intelligence analyst Bradley Manning begins illegally leaks classified information to WikiLeaks  
7 revealing, among other matters, that the U.S. is extensively spying on the United Nations. Obama  
8 Attorney General Eric Holder renews a Bush-era subpoena of New York Times reporter James  
9 Risen in a leak investigation. Obama administration pursues espionage charges against NSA  
10 whistleblower Thomas Drake. (According to the ACLU: spy charges were later dropped and Drake  
11 pled guilty to a misdemeanor. The judge called the government’s conduct in the case  
12 “unconscionable.”)

13  
14 May 28, 2010: The government secretly applies for a warrant to obtain Google email  
15 information of Fox News reporter James Rosen in a leak investigation, without telling Rosen.

16 James Rosen of Fox News  
17

18 September 21, 2010: Internal email entitled “Obama Leak Investigations” at “global  
19 intelligence” company Stratfor claims Obama’s then-Homeland Security adviser John Brennan is  
20 targeting journalists. “Brennan is behind the witch hunts of investigative journalists learning  
21 information from inside the beltway sources,” writes one Stratfor official to another. The email  
22 continues: “Note — There is specific tasker from the [White House] to go after anyone printing  
23 materials negative to the Obama agenda (oh my.) Even the FBI is shocked. The Wonder Boys must  
24 be in meltdown mode...” “The Wonder Boys” reportedly refers to the National Security Agency  
25 (NSA). Brennan later becomes President Obama’s CIA Director. John Brennan, former CIA  
26 Director and Homeland Security Adviser  
27

28 Early February 2011: After receiving an anonymous tip, CBS News investigative

1 correspondent Sharyl Attkisson begins researching the Department of Justice “gunwalking”  
2 operation nicknamed “Fast and Furious” that secretly let thousands of weapons be trafficked to  
3 Mexican drug cartels. One of the “walked” guns had been used by illegal aliens who murdered U.S.  
4 Border Patrol Agent Brian Terry in  
5 December 2010.

6  
7 February 22, 2011: CBS’ Attkisson breaks news about “Fast and Furious” on The CBS  
8 Evening News. After the story airs, the government issues an internal memo that seeks to “push  
9 positive stories” to contradict the news. [quote]Given the negative coverage by CBS Evening News  
10 last week...ATF needs to proactively push positive stories this week, in an effort to preempt some  
11 negative reporting, or at minimum, lessen the coverage of such stories in the news cycle by  
12 replacing them with good stories about ATF.[/quote]

13  
14 March 4, 2011: CBS News’ Attkisson exclusively interviews sitting ATF special agent John  
15 Dodson. He gives a firsthand account contradicting government denials re: Fast and Furious.

16  
17 May 2011: White House recruits democratic operative Eric Schultz to spin on Fast and  
18 Furious and to counter the House Oversight Committee’s investigative work on the case. (Schultz  
19 previously served as intern to Sen. Charles Schumer and Hillary Clinton.)

20 Former Obama operative Eric Schultz

21  
22 Spring 2011: Obama intel officials capture and record incidental private communications  
23 between Congressman Dennis Kucinich, a Democrat, and a Libyan official. The recordings are later  
24 leaked to the press.

25  
26 2011: Fox News reporter Mike Levine is subpoenaed by the Department of Justice regarding  
27 a story he reported about a federal grand jury’s indictments of terrorism suspects. The subpoena is  
28 later dropped.

1  
2 June 2, 2011: Republican Mitt Romney announces he'll challenge President Obama in  
3 campaign 2012.  
4

5 June 28, 2011: Obama U.S. Attorney for Arizona Dennis Burke secretly leaks sensitive  
6 government information to Fox News, allegedly to retaliate against ATF whistleblower John  
7 Dodson in the Fast and Furious case. (Burke is former chief of staff to former Arizona Governor  
8 Janet Napolitano.)  
9

10 August 2011: U.S. Attorney Burke resigns while under investigation for the improper leak  
11 of sensitive information about Dodson. The Inspector General later confirms the leak and Burke  
12 apologizes.  
13

14 September 2011: White House operative Schultz invites Attkisson and several other national  
15 journalists to off the record backgrounder about Fast and Furious documents subpoenaed by  
16 Congress. Later, on the phone, Shultz screams and cusses at Attkisson as she asks questions raised  
17 by the Fast and Furious documents.  
18

19 October 3, 2011: Obama administration secretly changes longstanding policy. The change  
20 creates a "loophole" that Sen. Ron Wyden would later say allows the NSA to conduct "backdoor  
21 searches" of "incidental collection" of U.S. citizens' domestic communications.

22 The same day, CBS News airs Attkisson's report on newly-uncovered memos that contradict  
23 Attorney General Eric Holders' denials about Fast and Furious.  
24

25 October 4, 2011: In an internal email, Attorney General Eric Holder's top press aide Tracy  
26 Schmalzer emails White House operative Schultz calling Attkisson "out of control." Schultz replies,  
27 "Her piece was really bad for the AG."  
28

1 November 2011: CIA Director Gen. David Petraeus, who's married, allegedly begins an  
2 affair with his biographer, Paula Broadwell. (The FBI would later say it "stumbled" upon evidence  
3 of the affair incidentally during an unspecified, much broader investigation.)  
4

5 December 2011: Amid much criticism, Justice Department finally, officially retracts the  
6 false letter it had submitted to Congress in February. The letter had stated that the Fast and Furious  
7 allegations of gunwalking were untrue.  
8

9 February 13, 2012: At approximately 10:30pm, remote intruders secretly download new spy  
10 software proprietary to a federal agency onto Attkisson's CBS work computer. (The software was  
11 secretly attached to a legitimate Hotmail email and downloaded in the background after a pop-up ad  
12 appeared).  
13

14 April-May 2012: The Department of Justice (DOJ) and FBI publicly announce vast  
15 expansion of cyber related efforts to address alleged "national security-related cyber issues." In  
16 violation of longstanding practice, DOJ secretly and without notice seizes personal and phone  
17 records of journalists from Associated Press from this two-month period in a leak investigation.  
18

19 June 2012: Attorney General Holder secretly initiates investigations into AP and the New  
20 York Times regarding government leaks.  
21

22 June 28, 2012: The House of Representatives holds Attorney General Holder in contempt of  
23 Congress for refusing to turn over subpoenaed documents related to Fast and Furious.  
24

25 July 2012: The Department of Justice designates U.S. Attorneys' offices to act as "force  
26 multipliers" in further stepped-up cyber efforts in the name of national security. Intruders remotely  
27 "refresh" ongoing surveillance of Attkisson's CBS News Toshiba laptop.  
28

1 Summer 2012: The FBI incidentally stumbles across emails revealing CIA Director  
2 Petraeus' affair with his biographer Broadwell. FBI Director Robert Mueller is notified of the affair  
3 on a date the government will not disclose. The FBI later says it interviewed Petraeus and  
4 Broadwell, and concluded national security hasn't been breached. The FBI keeps all of this  
5 information secret. In late summer, on a date the government won't reveal, the FBI notifies  
6 Attorney General Holder of the Petraeus affair.

7  
8 September 11, 2012: Four Americans, including U.S. Ambassador Christopher Stevens are  
9 murdered in Benghazi, Libya during attacks by Islamic extremist terrorists. Despite internal  
10 communications that acknowledge the terrorist nature of the attacks within minutes, the Obama  
11 administration falsely reports to the public that the attacks were instead a protest gone awry after an  
12 anti-Islamic YouTube video. Some Obama officials become frustrated with CIA Director Petraeus  
13 and his post-Benghazi attack behavior, as he opposes efforts to edit out mentions of terrorism from  
14 the public Benghazi talking points. Petraeus deputy Mike Morell is given authority over the edits,  
15 and aligns with Hillary Clinton's State Department against Petraeus's desires.

16  
17 October 2012: CBS begins airing Attkisson's Benghazi stories which rely on whistleblowers  
18 and numerous government-linked confidential sources. These sources report that the Executive  
19 Branch is clamping down on leaks to reporters re: Benghazi. DOJ continues its stepped-up National  
20 Security Division cyber efforts, holding specialized training at DOJ headquarters for the National  
21 Security Cyber Specialists (NSCS) network and the Criminal Division's Computer Crime and  
22 Intellectual Property Section (CCIPS). President Obama issues top secret presidential directive on  
23 Oct. 16 ordering intelligence officials to draw up a list of overseas targets for cyberattacks.  
24 According to The Guardian, the directive also "contemplates the possible use of cyber actions inside  
25 the US." As CIA Director Petraeus's interagency relationships become increasingly strained over  
26 his stance on Benghazi, unnamed FBI agents reach out to Republicans in Congress to tell about  
27 Petraeus's affair. They eventually land at the office of Republican majority leader Eric Cantor. With  
28 the presidential elections about a week away, Cantor stays mum on the Petraeus rumors and instead

1 contacts the FBI about them. The FBI interviews Petraeus and Broadwell a second time.

2  
3 November 2, 2012: The FBI questions President Obama's vice chair of the Joint Chiefs of  
4 Staff James Cartwright in a leak investigation regarding material in a book written by a New York  
5 Times reporter. Cartwright denies being the source (but later admits he was, and is convicted in the  
6 case).

7  
8 November 6, 2012: President Obama defeats Mitt Romney in Campaign 2012. CIA Director  
9 Petraeus is scheduled to testify to Congress next week about the Benghazi attacks. Officials claim  
10 this day is the first time Director of National Intelligence Clapper is notified about the Petraeus  
11 affair by an unspecified official at the Justice Department. Clapper calls Petraeus and urges him to  
12 resign.

13  
14 November 7-9, 2012: Attorney General Holder hosts a national training conference at DOJ  
15 headquarters for the expanded efforts of DOJ's National Security Cyber Specialists (SCS). The  
16 Obama administration says somebody unspecified notifies someone at the White House about the  
17 Petraeus affair on Nov. 7. The President is reportedly looped in for the first time on Nov. 8 and  
18 accepts Petraeus' resignation on Nov. 9. Petraeus' planned appearance before Congress to testify on  
19 Benghazi is canceled.

20  
21 November 13, 2012: The F.B.I. initiates a body of cyber security case investigations that  
22 would later relate to Attkisson's computer intrusions.

23  
24 December 2012: Two intelligence-connected sources separately suggest to Attkisson that  
25 she's likely under government surveillance due to her reporting. One source tells her the  
26 government has pushed the envelope like never before and that public would be shocked to "learn  
27 the extent that the government is conducting surveillance of private citizens." As Attkisson arranges  
28 a forensic exam of her computer, evidence later shows the intruders then attempted to cover their

1 tracks and to erase evidence of their intrusion. However, the erasures leave additional forensic  
2 evidence.

3  
4 December 27, 2012: Sens. Ron Wyden (D-Ore.) and Mark Udall (D-Colo.), who have  
5 classified knowledge as members of the Senate Intelligence Committee, publicly warn of the “back-  
6 door search loophole” or searches of incidental collection of innocent Americans.

7 “As it is written, there is nothing to prohibit the intelligence community from searching  
8 through a pile of communications, which may have been incidentally or accidentally been collected  
9 without a warrant, to deliberately search for the phone calls or e-mails of specific Americans.—Sen.  
10 Mark Udall, D-Colorado.”

11 Sen. Mark Udall

12  
13 2013: Obama administration brings court martial against Army intelligence analyst Bradley  
14 Manning, who has changed his name to Chelsea, for a 2010 leak of classified information to  
15 WikiLeaks that revealed American military and diplomatic activities across the world. Manning is  
16 sentenced to 35 years in prison, the longest punishment ever given in a U.S. leak case.

17  
18 January 2013: Two forensics examinations confirm unauthorized remote intrusions and  
19 monitoring of Attkisson’s work and personal computers. The information is not publicly reported at  
20 this time.

21  
22 January 23, 2013: The Obama administration prosecutes CIA whistleblower John Kiriakou  
23 for leaks to a reporter as he blew the whistle on the CIA’s secret torture program. He’s the first CIA  
24 officer convicted of providing classified information to a reporter.

25  
26 March 12, 2013: Director of National Intelligence James Clapper testifies to Congress,  
27 falsely stating that intelligence officials are not collecting mass data on tens of millions of  
28 Americans.

1  
2 April 12, 2013: The government Foreign Intelligence Surveillance Agency (FISA) court  
3 secretly approves the latest FBI request to continue obtaining daily telephone records of millions of  
4 U.S. Verizon customers. The judge orders Verizon to turn over the information to the National  
5 Security Agency (NSA). This directly contradicts Clapper's March 12 testimony to Congress.

6  
7 April 2013: A secret government memo later exposed by NSA whistleblower Edward  
8 Snowden discusses how the U.S. is collecting information "directly from the servers of ...  
9 Microsoft, Yahoo, Google, Facebook, PalTalk, AOL, Skype, YouTube, Apple."

10  
11 May 10, 2013: After longstanding denials, the IRS admits to and apologizes for targeting  
12 Republican Tea Party groups for mischief, which included discussing developing pretenses for  
13 prosecution, leading up to the 2012 election.

14  
15 May 13, 2013: The Associated Press (AP) publicly announces that it has learned of the  
16 Justice Department's secret subpoena of phone records for 20 AP reporters, in a leak investigation.  
17 Attorney General Holder personally approved the subpoenas, which were issued to Verizon rather  
18 than AP. AP calls it a "massive and unprecedented intrusion" into news-gathering operations.

19  
20 May 17, 2013: Fox News learns that the Justice Department secretly labeled reporter James  
21 Rosen a possible "criminal co-conspirator" and "flight-risk" in obtaining warrants to monitor  
22 Rosen's State Department movements, phone records and emails in a leak investigation starting in  
23 2011.

24  
25 June 2013: The FBI secretly opens a case on Attkisson's computer intrusions under the  
26 auspices of a national security issue. The FBI contacts CBS without Attkisson's knowledge, but  
27 fails to contact or interview Attkisson. (The FBI later withholds Attkisson's FBI file in its entirety  
28 without explanation, and other documents, despite multiple Freedom of Information Act requests.)



1 News of the FBI case involving Attkisson's computer intrusions is circulated internally to the  
2 Justice Department's national cyber security group, and grouped with a set of cases opened in  
3 November 2012.

4  
5 June 2013: Former National Security Agency NSA contractor Snowden begins releasing  
6 documents showing extensive efforts by the government to surveil and collect information on U.S.  
7 citizens. Snowden is charged with three felonies in his absence from the U.S.

8 NSA Whistleblower Edward Snowden.

9  
10 June 6, 2013: At a hearing, Sen. Mark Kirk, R-Illinois, asks Attorney General Eric Holder if  
11 the NSA spies on members of Congress. Holder answers that the NSA has no "intent" to spy on  
12 Congress, but that the issue is better addressed in private.

13  
14 July 2, 2013: Director of National Intelligence Clapper apologizes to Congress for his false  
15 testimony in March regarding widespread collection of data on Americans.

16  
17 August 6, 2013: Armed Coast Guard agents under the Department of Homeland Security  
18 raid the home of reporter Audrey Hudson at 4:30am with a search warrant for her husband's  
19 firearms. As they searched the house, they read Hudson her Miranda rights and confiscated  
20 documents that contained "confidential notes, draft articles, and other newsgathering materials"  
21 belonging to Hudson including the identities of whistleblowers at the Department of Homeland  
22 Security. (Hudson sues and later receives a settlement from the government.)

23  
24 August 7, 2013: CBS News publicly announces confirmation of Attkisson's computer  
25 intrusions. "Attkisson's computer was accessed by an unauthorized, external, unknown party on  
26 multiple occasions late in 2012...This party also used sophisticated methods to remove all possible  
27 indications of unauthorized activity, and alter system times to cause further confusion."—CBS  
28 News

1  
2 September 19, 2013: The Obama Justice Department charges FBI agent and contractor  
3 Donald Sachtleben with leaking to an AP reporter details of disrupted terrorist bomb plot. He's  
4 sentenced to 43 months in prison.

5  
6 January 23, 2014: Sen. Bernie Sanders asks the NSA if it spies on members of Congress.  
7 The NSA does not provide a direct answer and states that Congress is afforded "the same privacy  
8 protections as all U.S. persons."

9  
10 March 2014: Congress accuses the CIA of improperly accessing Senate Intelligence  
11 committee computers. CIA Director Brennan denies it. Director of National Intelligence Clapper  
12 bans intelligence community officials from unauthorized contact with reporters.

13  
14 April 2, 2014: Former state department contractor Stephen Jin-Woo Kim is sentenced to  
15 prison for disclosing classified information to Fox News reporter James Rosen.

16  
17 July 31, 2014: CIA Inspector General reveals that five CIA officials improperly accessed  
18 Senate Intelligence Committee computers and searched certain staff emails. The findings contradict  
19 denials made in March by CIA director Brennan. Brennan apologizes to Senate staff.

20  
21 October 2014: The government pays a settlement to reporter Audrey Hudson after the 2013  
22 Coast Guard raid of her home during which her work notes were improperly seized.

23  
24 December 2014: Attorney General Holder seeks to subpoena a 60 Minutes producer in  
25 connection with a terrorism trial, but pulls back the request after public criticism.

26  
27 Spring 2015: The Obama administration finishes secretive negotiations of an Iran nuclear  
28 deal that will return billions of dollars in frozen funds to the world's largest state sponsor of

1 terrorism in return for assurances from that country. It's later reported that Obama intel officials  
2 have been incidentally capturing communications of U.S. members of Congress and organizations  
3 in the U.S. while secretly recording Israeli Prime Minister Benjamin Netanyahu's discussions about  
4 the Iran deal, which he opposes. As of now, the New York Times reports "since 2009, six current or  
5 former government employees and two government contractors have been indicted or prosecuted  
6 under the Espionage Act for leaking information to the public. There were only three such  
7 prosecutions under all previous U.S. presidents combined since 1917."

8  
9 May 2015: Former CIA employee Jeffrey Alexander Sterling is convicted on espionage  
10 charges for leaks to New York Times reporter James Risen. He's sentenced to 3 1/2 years in prison.

11  
12 December 2015: The Cybersecurity Information Sharing Act (CISA) passes. It requires  
13 private Internet companies to "transmit cyber-threat indicators" to the Department of Homeland  
14 Security and granting the companies immunity from prosecution for sharing customers' personal  
15 data in those cases. The Wall Street Journal reports that the Obama administration incidentally  
16 collected private communications by members of Congress while it spied on Israeli Prime Minister  
17 Netanyahu. "The NSA sweeping up "private conversations with U.S. lawmakers and American-  
18 Jewish groups... raised fears [of]—an 'Oh-s— moment,' one senior U.S. official said—that the  
19 executive branch would be accused of spying on Congress."—Wall Street Journal, December 29,  
20 2015."

21  
22 July 2016: Donald Trump wins the Republican nomination for president. According to later  
23 news reports, after Trump's nomination, internal White House logs show Obama National Security  
24 Adviser Susan Rice begins to show increased interest in National Security Agency (NSA)  
25 intelligence material that included "unmasked" Americans' identities. Former Obama national  
26 security adviser Susan Rice is told will get paid off via a cushy Netflix job.

27  
28 Summer 2016: The FBI reportedly tries to obtain a secret FISA court order to monitor

1 communications of Trump adviser Carter Page, alleging that Page is acting as a Russian agent. The  
2 application is turned down but approved in October when the anti-Trump “dossier” is included to  
3 justify the wiretap application. Read: When “Incidental” Intel Collection Isn’t Incidental

4 Former Trump adviser Carter Page

5  
6 2016: It’s not yet known publicly, but CNN later reports that the Obama Justice Department  
7 wiretapped Trump campaign manager Paul Manafort before the 2016 election over Russia ties,  
8 closed the investigation, then began surveillance anew sometime in the fall and continued it through  
9 the early part of 2017.

10  
11 Fall 2016: Trump opponents “shop” to reporters a political opposition research “dossier”  
12 alleging Trump is guilty of various inappropriate acts regarding Russia. The information is  
13 unverified (and some of it is false) and the press doesn’t publish it, but a copy is provided to the  
14 FBI.

15  
16 September 26, 2016: It’s not publicly known at the time, but the government makes a  
17 proposal to the secretive Foreign Intelligence Surveillance Court (FISC) court to allow the National  
18 Counter Terrorism Center to access “unmasked” intel on Americans acquired by the FBI and NSA.  
19 (The Court later approves as “appropriate”).

20  
21 October 7, 2016: Former vice chair of the Joint Chiefs of Staff James Cartwright pleads  
22 guilty in a leak investigation to lying to the FBI about his discussions with reporters regarding  
23 Iran’s nuclear program.

24  
25 October 26, 2016: At closed-door hearing before the Foreign Intelligence Surveillance  
26 Court, the Obama administration disclosed that it had been violating surveillance safeguards,  
27 according to Circa. It disclosed that more than 5 percent of its searches of the NSA’s database  
28 violated safeguards promised in 2011.

1  
2 November 8, 2016: Donald Trump is elected President.  
3

4 November 2016-January 2017: News reports claim Rice's interest in the NSA materials  
5 accelerates after President Trump's election through his January inauguration. Surveillance  
6 reportedly included Trump transition figures and/or foreign officials discussing a Trump  
7 administration.  
8

9 December 2016: FBI secretly monitors and records communications between Russian  
10 ambassador, Sergey Kislyak and Lt. Gen. Michael Flynn, who later became President Trump's  
11 national security adviser. After Trump's election, Obama officials take steps to ensure certain  
12 intelligence gathered regarding Trump associates is "spread across the government." One Obama  
13 official would later say it's because they were afraid once Trump officials "found out how we knew  
14 what we knew," the intelligence would be destroyed. However, Obama critics later theorize Obama  
15 officials were working to mount opposition to Trump's presidency.  
16

17 December 15, 2016: National Security Adviser Susan Rice later reportedly acknowledged  
18 that the Obama administration spied on Trump officials in Trump Tower on this date, but claimed it  
19 was incidental to the administration's spying on the foreign leader they were meeting with: the UAE  
20 crown prince. Rice also reportedly admitted to "unmasking" the names of the Trump officials who  
21 met with the crown prince, saying it was important to know who they were, although the identities  
22 of Americans are supposed to be strictly protected except in extraordinary circumstances. Trump  
23 officials who met with the crown prince reportedly included: Steve Bannon, Jared Kushner and  
24 Gen. Michael Flynn.  
25

26 January 10, 2017: The media reports on the leaked anti-Trump "dossier" compiled by a  
27 political opposition research group containing unverified and at least partly untrue allegations of  
28 misconduct involving Trump and Russia.

1  
2 January 12, 2017: The Obama administration finalizes new rules allowing the National  
3 Security Agency (NSA) to spread certain intelligence to 16 other U.S. intel agencies without the  
4 normal privacy protections. President Obama commutes all but the last four months of Manning's  
5 sentence for leaking intelligence information to WikiLeaks.

6  
7 February 2, 2017: The news reports that five information technology (IT) computer  
8 professionals employed by Democrats in the House of Representatives are under criminal  
9 investigation for allegedly "accessing House IT systems without lawmakers' knowledge." The  
10 suspects include three brothers identified as Abid, Imran and Jamal Awan "who managed office  
11 information technology for members of the House Permanent Select Committee on Intelligence and  
12 other lawmakers." The brothers were said to have been employed by three Democrats on the  
13 Intelligence Committee and "five members of the House Committee on Foreign Affairs which deal  
14 with with many of the nation's most sensitive issues and documents, including those related to the  
15 war on terrorism."

16  
17 February 9, 2017: News of the FBI recordings of Lt. Gen. Flynn speaking with Russia's  
18 ambassador is leaked to the press. The New York Times and the Washington Post report that Flynn  
19 was captured on wiretaps discussing current U.S. sanctions, despite Flynn's earlier denials. The  
20 Washington Post also reports the FBI reviewed Flynn's calls with Russian ambassador and "found  
21 nothing illicit."

22  
23 Feb. 13, 2017: Trump National Security Adviser Flynn resigns, acknowledging he had  
24 misled Vice President Pence about his Russia conversations.

25  
26 March 2017: The House Intelligence Committee requests a list of unmasking requests made  
27 during a certain time period by Obama officials. The intelligence committee does not provide the  
28 information, prompting a June 1 subpoena.

1  
2 March 1, 2017: The Washington Post learns and reports that Trump Attorney General Jeff  
3 Sessions has met with the Russian ambassador twice in the recent past. Sessions had told Congress  
4 he didn't communicate with the Russians during the campaign. (The Russian ambassador had  
5 sought out and met with numerous high-ranking Democrat and Republican officials.)

6 Attorney General Jeff Sessions  
7

8 March 2, 2017: In an interview on MSNBC, Obama Deputy Assistant Secretary of Defense  
9 Evelyn Farkas says that once President Trump was elected, she urged her former colleagues to "get  
10 as much information as you can, get as much intelligence as you can [about Trump and his  
11 associates] before President Obama leaves the administration" and get it to "people on Capitol  
12 Hill."

13 Former Obama Deputy Assistant Secretary of Defense for Russia, Evelyn Farkas - Trump  
14 Attorney General Jeff Sessions recuses himself from any Trump campaign-related investigations  
15 after backtracking on earlier statements that he had not met with Russian officials prior to the  
16 election.  
17

18 March 4, 2017: President Trump tweets: "Is it legal for a sitting President to be 'wire  
19 tapping' a race for president prior to an election? Turned down by court earlier. A NEW LOW!"  
20 and "How low has President Obama gone to tapp my phones during the very sacred election  
21 process. This is Nixon/Watergate. Bad (or sick) guy!"  
22

23 March 10, 2017: Former Congressman Dennis Kucinich, a Democrat, steps forward to  
24 support Trump's wiretapping claim, revealing that the Obama administration recorded his  
25 (Kucinich's) communications with a Libyan official in Spring 2011.  
26

27 March 20, 2017: At a hearing, lead House Intelligence Committee Democrat Adam Schiff  
28 places Trump adviser Carter Page at the center of a theoretical alleged collusion with Russia. (It's

1 not yet publicly known that the FBI has been surveilling Page.) Some critics see Schiff's storyline  
2 as an attempt to establish public justification for the Obama administration intel community's  
3 controversial surveillance of the Trump adviser during the 2016 political campaign.

4 Rep. Adam Schiff

5  
6 March 22, 2017: Chairman of the House Intelligence Committee Devin Nunes publicly  
7 announces that he has reviewed evidence of U.S. citizens associated with Trump being  
8 "incidentally" surveilled by Obama intelligence officials, and that the names and information of the  
9 Trump associates were illegally leaked and/or used, mostly in November, December and January.  
10 Nunes attends a meeting at the White House to discuss. He's criticized for viewing the evidence and  
11 speaking of it publicly. In an interview on PBS, former Obama National Security Adviser Rice says  
12 "I know nothing about this...I really don't know to what Chairman Nunes was referring."

13  
14 March 24, 2017: The political firm that compiled the Trump "dossier" that was leaked to the  
15 press, Fusion GPS, declines to answer questions or document requests from Sen. Charles Grassley.

16  
17 March 31, 2017: Democrat Schiff is invited to the White House to review intel material  
18 Republican Nunes saw earlier.

19  
20 April 3, 2017: Multiple news reports state that prior to the election, Rice had requested and  
21 reviewed "unmasked" intelligence on Trump associates whose information was "incidentally"  
22 collected by intelligence agencies.

23  
24 April 4, 2017: In an interview on MSNBC, Rice seems to reverse herself (having earlier said  
25 she knew "nothing" about unmasking of surveilled Trump associates) and admits having asked for  
26 names of U.S. citizens previously masked in intelligence reports. Rice says her motivations were  
27 not political or to spy. When asked if she leaked names of U.S. citizens, Rice replies, "I leaked  
28 nothing to nobody."



1  
2 April 6, 2017: House Intelligence Committee Chairman Nunes recuses himself from the  
3 Russia part of his committee's investigation.  
4

5 April 11, 2017: Someone leaks to the Washington Post, and the Post reports, that the FBI  
6 secretly obtained a FISA court order last summer to monitor Trump campaign associate Carter  
7 Page. Trump critics say the existence of the order proves there was possible criminal activity by  
8 Trump associates. However, Trump supporters say the leak is an attempt to frame damning  
9 revelations as they are coming to light: that the Obama administration was, indeed, surveilling the  
10 political campaign of at least one opponent.  
11

12 April 28, 2017: The NSA announces it "will no longer collect certain internet  
13 communications that merely mention a foreign intelligence target." This after it secretly disclosed  
14 mass violations to the FISA court last October. The NSA also begins deleting prior collected data. It  
15 says it's doing this to avoid further violations.  
16

17 May 2, 2017: Members of Senate Intelligence Committee go to CIA headquarters to get  
18 briefed on Russia-Trump connections. The following day, CNN asks Senate Intelligence Committee  
19 member Dianne Feinstein if there is evidence of "collusion between Trump associates and Russia  
20 during the campaign." "Not at this time," replies Feinstein.  
21

22 May 3, 2017: Obama's former National Security Adviser Susan Rice declines Republican  
23 Congressional request to testify at a hearing about the unmasking and surveillance.  
24

25 May 4, 2017: It's revealed that in the election year of 2016, the Obama administration vastly  
26 expanded its searches of NSA database for Americans and the content of their emails and phone  
27 calls: From 9500 searches involving 198 Americans in 2013 to 30,355 searches of 5,288 Americans  
28 in 2016.

1  
2 May 5, 2017: Senator and former Presidential candidate Rand Paul (R-KY) formally asks  
3 the White House and intelligence community whether he was surveilled under the Obama  
4 administration.

5  
6 May 14, 2017: Former Director of National Intelligence James Clapper and ex-Deputy  
7 Attorney General Sally Yates, Obama administration officials, admit to reviewing “classified  
8 documents in which Mr. Trump, his associates or members of Congress had been unmasked.” They  
9 won’t provide further details in public.

10  
11 May 31, 2017: Document is disclosed to Justice Department in a lawsuit claiming the NSA  
12 engaged in “blanket surveillance” of the 2002 Winter Olympics in Salt Lake City, Utah, collecting  
13 and storing “virtually all electronic communications going into or out of the Salt Lake City area,  
14 including the contents of emails and text messages” to “experiment with and fine tune a new scale  
15 of mass surveillance.” Former CIA and NSA director Michael Hayden has denied such a program  
16 existed.

17  
18 June 1, 2017: House Intelligence Committee issues 7 subpoenas including for information  
19 related to unmaskings requested by ex-Obama officials national security adviser Susan Rice, former  
20 CIA Director John Brennan and former U.S. ambassador to the U.N. Samantha Power. Chairman  
21 Devin Nunes says the intelligence community has been stonewalling the committee’s March request  
22 for a list of all the unmaskings that occurred during a certain time period.

23  
24 Sept. 13, 2017; Under questioning from Congress, former Obama adviser Susan Rice  
25 reportedly admits having requested to see the protected identities of Trump transition officials who  
26 were “incidentally” captured by government surveillance. (For their privacy protection, identities of  
27 U.S. citizens captured during surveillance of foreign foreign targets are supposed to be protected or  
28 “masked” from other government officials. Applications by federal officials to “unmask” the names

1 or see the identities are supposed to be rare and carefully considered.

2  
3 Sept. 18, 2017: CNN reports that the Obama Justice Department wiretapped Trump  
4 campaign manager Paul Manafort before the 2016 election over Russia ties, closed the  
5 investigation, then began surveillance anew sometime in the fall and continued it through the early  
6 part of 2017.

7  
8 October 17, 2017: After word that Obama U.N. Ambassador Samantha Power had made  
9 near daily unmasking requests during the 2016 election year, Power reportedly told Congressional  
10 investigators that many of the requests in her name were not made by her.

11  
12 Fight government overreach and double-standard justice by supporting the Attkisson Fourth  
13 Amendment Litigation Fund for Attkisson v. DOJ and FBI for the government computer intrusions.  
14 Click here.

15  
16 SEE THE BOOK: "The Smear: How Shady Political Operatives and Fake News Control  
17 What You See, What You Think and How You Vote."

18  
19 =====  
20 =====  
21 =====

22  
23 THE AFGHANISTAN INVASION FOR RARE EARTH METALS FOR SILICON  
24 VALLEY'S ELECTRIC CARS AND CELL PHONES

25  
26  
27 By Jean-Charles Brisard and Senate Ethics Committee Staff  
28

1  
2 Russian "treasure maps" are acquired by local Afghan CIA operatives which claim that,  
3 during Russia's occupation of Afghanistan, Russia uncovered "trillions" of dollars of rare earth  
4 minerals in Afghanistan. These maps are now thought to have been fakes. USAID prepares  
5 marketing documents to sell an invasion of Afghanistan to Big Tech oligarchs in Silicon Valley  
6 with the promise that "all of their electric car batteries and cell phones" can come from Afghan  
7 mines. Obama staff tell Silicon Valley search engine and web companies that if "they put Obama in  
8 Office, Obama will give them the Afghan rare earth mine upside.", as a quid-pro-quo trade. Elon  
9 Musk, his business partners and some California Senators get wind of this and want "their piece of  
10 the pie".

11  
12 A 1998 memo written by al-Qaida military chief Mohammed Atef reveals that Osama bin  
13 Laden's group had detailed knowledge of negotiations that were taking place between Afghanistan's  
14 ruling Taliban and American government and business leaders over plans for a U.S. oil and gas  
15 pipeline across that Central Asian country. The e-mail memo was found in 1998 on a computer  
16 seized by the FBI during its investigation into the 1998 African embassy bombings, which were  
17 sponsored by al-Qaida. Atef's memo was discovered by FBI counter-terrorism expert John O'Neill,  
18 who left the bureau in 2001, complaining that U.S. oil interests were hindering his investigation  
19 into al-Qaida. O'Neill, who became security chief at the World Trade Center, died in the Sept. 11  
20 attack.

21  
22 Atef's memo shines new light on what al-Qaida knew about U.S. efforts to normalize  
23 relations with the Taliban in exchange for the fundamentalist government's supporting the  
24 construction of an oil and gas pipeline and rare earth mines across Afghanistan. As documented in  
25 the book I coauthored with Guillaume Dasquie, "Bin Laden: The Forbidden Truth," the Clinton and  
26 Bush administrations negotiated with the Taliban, both to get the repressive regime to widen its  
27 government as well as look favorably on U.S. companies' attempts to construct an oil pipeline. The  
28 Bush White House stepped up negotiations

1 with the Taliban in 2001. When those talks stalled in July, a Bush administration  
2 representative threatened the Taliban with military reprisals if the government did not go along with  
3 American demands.

4  
5 The seven-page memo was signed "Abu Hafs," which is the military name of Atef, who was  
6 the military chief of al-Qaida and is believed to have been killed in November 2001 during U.S.  
7 operations in Afghanistan. It shows al-Qaida's keen interest in the U.S.-Taliban negotiations and  
8 raises new questions as to whether the U.S. military threat to the Taliban in July  
9 2001 could have prompted al-Qaida's Sept. 11 attack.

10  
11 Atef's memo is not about the pipeline alone, though it mentions the project several times. It  
12 is an analysis of the political situation facing the Taliban. It documents the movement's rise, its  
13 leadership, the geopolitical importance of Afghanistan, the Taliban's relationship with Pakistan, as  
14 well as the movement's relationship with the Arab mujahedin. The document's intended readership  
15 is unclear. But it reveals that the pipeline was seen as a strategic offering toward the West, in order  
16 to make the Taliban government acceptable to the United States and Pakistan, as well as to reduce  
17 military and investigative pressure on the country to rein in or even extradite bin Laden.

18  
19 Atef explains that the United States wants "to take control of any region which has huge  
20 quantities of oil reserves," and "the American government is keen on laying the oil and gas  
21 pipelines from Turkmenistan through Afghanistan to Pakistan." Atef concludes that al-Qaida's "duty  
22 toward the movement [Taliban] is to stand behind it, support it materially and  
23 morally, especially because its regional and international enemies are working night and  
24 day to put an end to it and make it fail."

25  
26 It seems clear the military chief didn't expect the pipeline negotiations to bear fruit.  
27 Referring to Pakistanis as "nonbelievers," and noting that the pipeline "will be under American  
28 control " and it also goes through the territories of Pakistan which are allied to America," Atef

1 implies that the Taliban has no intention of ultimately cooperating with the project, but is trying to  
2 string along the Americans and Pakistanis to win some breathing room for its unpopular  
3 government.

4  
5 The Atef memo is the latest piece of evidence documenting a murky chapter in recent  
6 American history - the overtures of the last two American administrations to the repressive Taliban  
7 regime. Several U.S. oil companies, most notably Unocal, had been advocates of diplomatic  
8 overtures to the Taliban, in order to facilitate the building of a pipeline from the

9 Caspian Sea region to Pakistan and the Persian Gulf through Afghanistan. In 1996, Unocal  
10 vice president Chris Taggart described the fall of Kabul to the Taliban regime as a "very positive  
11 step" and urged the U.S. to extend recognition to the new rulers in Kabul and thus "lead the way to  
12 international lending agencies coming in."

13  
14 Just 10 days after the Taliban seized power in Kabul, Zalmay Khalilzad, former National  
15 Security Council official and Unocal consultant who was appointed special envoy to Afghanistan by  
16 President George W. Bush at the end of 2001, argued in a Washington Post opinion article that the  
17 U.S. should try to work with the mullahs and form a broad-based government that

18 included other factions. "The Taliban does not practice the anti-U.S. style of  
19 fundamentalism practiced by Iran - it is closer to the Saudi model ."Khalilzad contended,  
20 concluding that "we should use as a positive incentive the benefits that will accrue to Afghanistan  
21 from the construction of oil, mining and gas pipelines across its territory " These projects will only  
22 go forward if Afghanistan has a single authoritative government."

23  
24 Soon after, the State Department spokesman Glyn Davies told the New York Times he had  
25 hope that "the new authorities in Kabul will move quickly to restore order and security and to form  
26 a representative interim government that can begin the process of reconciliation nationwide."  
27 Davies also said the United States "wanted to send diplomats to Afghanistan to meet with the  
28 Taliban and held out the possibility of re-establishing full diplomatic ties with the country,"

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1 according to the Times.

2  
3 - 1997  
4

5 In November 1997 Unocal invited a Taliban delegation to Texas and, in early December, the  
6 company opened a training center at the University of Nebraska, to instruct 137 Afghans in pipeline  
7 construction technology. The company also donated to the university's Center for Afghanistan  
8 Studies. Unocal CEO John Imle estimated that the company spent between \$15 and \$20  
9 million on its Central Asia oil pipeline (CentGas) project - on preliminary feasibility  
10 studies, humanitarian projects and other efforts to lobby the Taliban (Unocal equipped the regime  
11 with satellite phones, for instance.)  
12

13 - 1998  
14

15 In February 1998, Unocal's vice president for international relations, John Maresca, told a  
16 House subcommittee hearing on U.S. interests in the Central Asian Republics that an oil pipeline  
17 "would benefit Afghanistan, which would receive revenues from transport tariffs, and would  
18 promote stability and encourage trade and economic development." Emphasizing that "the proposed  
19 Central Asia Oil Pipeline (CentGas) cannot begin construction until an internationally recognized  
20 Afghanistan government is in place," he urged the administration and the Congress "to give strong  
21 support to the

22 United Nations-led peace process in Afghanistan."  
23

24 Until the 1998 al-Qaida embassy bombings, the Clinton administration's approach toward  
25 the Taliban was much the same as Unocal's: All parties agreed that the political stabilization of  
26 Afghanistan was crucial to the region, and was also a way to gain access to oil reserves of the  
27 Caspian Sea region. Though bin Laden had been in the country since 1996, the U.S.

28 had not pressured the Taliban to hand him over.

1  
2 The embassy bombings in August 1998 changed everything. The Clinton administration  
3 denounced the regime and Secretary of State Madeleine Albright turned up the heat on Taliban  
4 human rights abuses. The United Nations imposed sanctions, freezing Afghanistan's foreign assets  
5 and limiting its citizens' travel. The U.S. continued to talk to the Taliban, but the emphasis was on  
6 extraditing bin Laden in exchange for international recognition; the pipeline was off the table.  
7 Unocal, which had been close to finalizing its pipeline deal before the embassy bombings, cancelled  
8 it.

9  
10 When George W. Bush took office in 2001, his administration made new overtures to the  
11 Taliban, and the pipeline deal gained renewed support, as an incentive to get the Taliban to make  
12 political concessions and form a broader government. U.S. representatives met with Afghanistan's  
13 former King Shah, to see if he might be included in a new government. And American companies  
14 began exploring the failed 1998 pipeline project. A report by an Afghan-born Enron manager in  
15 July 2001, for instance, illustrates that company's deep interest in some sort of pipeline deal. Enron  
16 had begun funding the same sorts of humanitarian projects as Unocal had three years earlier.

17  
18 In March 2001, several Taliban officials, including Sayed Rahmattullah Hashimi, Mullah  
19 Omar's personal advisor, were invited to Washington by their U.S. lobbyist, Leila Helms, the niece  
20 of former CIA Director Richard Helms. The agenda included discussions of extraditing bin Laden  
21 as well as facilitating American companies' access to oil reserves in central Asia. The delegation  
22 met with representatives of the Directorate of Central Intelligence (DCI) and the Bureau of  
23 Intelligence and Research of the State Department.

24  
25 This visit provoked concern and criticism in Washington over how Hashimi obtained a visa,  
26 a plane ticket, security clearance and access to American institutions - including the State  
27 Department and the National Security Council - despite travel restrictions on Taliban leadership  
28 imposed by U.N. sanctions (the official answer was that Hashimi fell below the rank of senior



1 official covered by the sanctions.)Four months later, American diplomats met with Taliban  
2 emissaries as well

3 as representatives from Pakistan, Iran and Russia for four days of talks in Berlin in mid-  
4 July. Again, the message was that if the Taliban would extradite bin Laden and form a broad-based  
5 national government, it could win international recognition and reap extensive economic subsidies  
6 from the construction of a pipeline. The meeting was one of several convened by Francesco  
7 Vendrell, a Spanish diplomat who serves as the U.N.'s chief representative on Afghanistan. The  
8 delegates at the July meeting included Robert Oakley, former U.S. ambassador and Unocal lobbyist;  
9 Karl "Rick" Inderfurth, former assistant secretary of state for South Asian affairs; Lee Coldren, head  
10 of the Office of Pakistan, Afghan and Bangladesh Affairs in the State Department until 1997; Tom  
11 Simons, former U.S. ambassador to Pakistan and the most recent official negotiator with the  
12 Taliban; Niaz Naik, former Foreign Minister of Pakistan; Nikolai Kozyrev, a former Russian special  
13 envoy to Afghanistan; and Saeed Rajai Khorassani, formerly the Iranian representative to the U.N.  
14 The Taliban ambassador to Pakistan, Abdul Salam Zaeef, attended several sessions with some of  
15 the delegates in Berlin, according to Naif Naik, though officially the Taliban had not been invited.  
16 Naik was expected to carry the U.S. message to the Taliban.

17  
18 According to Naik, the point of the meeting was that "we would try to convey to them that if  
19 they did certain things, then, gradually, they could win the jackpot, get something in return from the  
20 international community."It might, Naik said, "be possible to persuade the Taliban that once a  
21 broader-based government was in place and the oil pipeline under way, there would be billions of  
22 dollars in commission, and the Taliban would have their own resources."

23  
24 It was at the July meeting, according to Naik, that Tom Simons suggested that Afghanistan  
25 could face an open-ended military operation from bases in Uzbekistan and Tajikistan if it didn't  
26 accede to U.S. demands. "Ambassador Simons stated that if the Taliban wouldn't agree with the  
27 plan, and if Pakistan was unable to persuade them, the United States might use an overt action  
28 against Afghanistan," Naik says. The words used by Simons were "a military operation," according

1 to Naik. Another participant reportedly said the Taliban's choice was clear: either accept a "carpet of  
2 gold" riches

3 from the pipeline or "a carpet of bombs," meaning a military strike.

4  
5 Lee Coldren, a member of the U.S. delegation, also confirmed to the British newspaper the  
6 Guardian the American position at the Berlin meeting. "I think there was some discussion of the  
7 fact that the United States was so disgusted with the Taliban that they might be considering some  
8 military action."

9  
10 In statements to newspapers, Simons has offered ambiguous explanations of his statements  
11 at the July meeting. In September, he told the British Guardian: "I've known Naik and considered  
12 him a friend for years. He's an honorable diplomat. I didn't say anything like that and didn't hear  
13 anyone else say anything like that. We were clear that feeling in Washington was strong, and that  
14 military action was one of the options down the road. But details, I don't know where they came  
15 from." Yet in a November interview with Le Monde, Simons seemed to confirm that there had been  
16 some talk of U.S. military action. "It is true that the Taliban was asked to deliver bin Laden and  
17 form a [broader] government," Simons told Le Monde. "We said in July that we were investigating  
18 the attack against the USS Cole in Yemen, and that if there were solid evidence of the implication  
19 of bin Laden, one had to expect a military answer. One can always inflate such a declaration to see a  
20 global threat against the Taliban. But the American declaration related only to the response to the  
21 USS-Cole.

22  
23 "As for the 'carpet of gold and the carpet of bombs,' we actually discussed the need for a  
24 plan for rebuilding for Afghanistan, which would follow a political agreement," he said, adding that  
25 "It's possible that a mischievous American participant, after several drinks, may have thought it  
26 smart to evoke gold carpets and carpet bombs. Even Americans can't resist the temptation to be  
27 mischievous."

1 The last known meeting between U.S. and Taliban representatives took place in August, five  
2 weeks before the Sept. 11 attacks, when U.S. Assistant Secretary of State for Central Asian affairs  
3 Christina Rocca met with the Taliban's ambassador to Pakistan Abdul Salam Zaeef.

4  
5 It would be unfair to suggest that the U.S. threat in July led to the al-Qaida strike. But while  
6 Simons doesn't admit that he personally threatened the Taliban with reprisal, he confirms that only a  
7 few weeks before Sept. 11, American diplomats warned of military action against Afghanistan if its  
8 leaders did not meet U.S. economic and political demands. It is worth asking whether, had this  
9 threat been widely known, U.S. intelligence agencies might have analyzed the information they  
10 were

11 receiving about bin Laden's plots against the U.S. differently.

12  
13 Now the newly discovered Atef memo makes clear that in 1998, at least, al-Qaida was well  
14 informed about negotiations between the Taliban and the U.S. on the oil pipeline and other  
15 American concerns. The memo also shows that those negotiations were the Taliban's gambit to  
16 extend its power; Mullah Omar's government never had any intention of allowing U.S. firms to  
17 construct an oil pipeline, or letting the U.S. dictate the members of its ruling body. Given the inside  
18 knowledge al-Qaida had about U.S.-Taliban negotiations, it's reasonable to suspect bin Laden's  
19 group also received and understood the U.S. threat of military action delivered in late July as a  
20 threat of war.

21  
22 In the end, though, the U.S. got its way. Interim Afghan leader Hamid Karzai decided on  
23 May 30 to revive the pipeline project with Pakistan and Turkmenistan, signing an agreement under  
24 which the three governments agree to implement a pipeline from Turkmenistan to Pakistan through  
25 Afghanistan. Would that U.S. intelligence agencies' investigations into al-Qaida activities in the  
26 months before Sept. 11 had such a productive ending.

27  
28 1. 1991-1997 - Major U.S. oil companies including ExxonMobil, Texaco, Unocal, BP

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1 Amoco, Shell and Enron directly invest billions in cash bribing heads of state in Kazakhstan to  
2 secure equity rights in the huge oil reserves in these regions. The oil companies further commit to  
3 future direct investments in Kazakhstan of \$35 billion. Not being willing to pay exorbitant prices to  
4 Russia to use Russian pipelines the major oil companies have no way to recoup their investments.  
5 ["The Price of Oil," by Seymour Hersh, The New Yorker, July 9, 2001 - The Asia Times, "The  
6 Roving Eye Part I Jan. 26, 2002.]

7  
8 2. December 4, 1997 - Representatives of the Taliban are invited guests to the Texas  
9 headquarters of Unocal to negotiate their support for the pipeline. Subsequent reports will indicate  
10 that the negotiations failed, allegedly because the Taliban wanted too much money. [Source: The  
11 BBC, Dec.

12 4, 1997]

13  
14 3. February 12, 1998 - Unocal Vice President John J. Maresca - later to become a Special  
15 Ambassador to Afghanistan - testifies before the House that until a single, unified, friendly  
16 government is in place in Afghanistan the trans-Afghani pipeline needed to monetize the oil will not  
17 be built. [Source: Testimony before the House International Relations Committee.]

18  
19 4. 1998 - The CIA ignores warnings from Case Officer Robert Baer that Saudi Arabia  
20 was harboring an al-Q'aeda cell led by two known terrorists. A more detailed list of known terrorists  
21 is offered to Saudi intelligence in August 2001 and refused. [Source: Financial Times 1/12/01; See  
22 No Evil by a book by Robert Baer (release date Feb. 2002).]

23  
24 5. April, 1999 - Enron with a \$3 billion investment to build an electrical generating plant  
25 at Dabhol India loses access to plentiful LNG supplies from Qatar to fuel the plant. Its only  
26 remaining option to make the investment profitable is a trans-Afghani gas pipeline to be built by  
27 Unocal from Turkmenistan that would terminate near the Indian border at the city of Multan.  
28 [Source: The Albion Monitor, Feb. 28, 2002.]

1  
2 6. 1998 and 2000 - Former President George H.W. Bush travels to Saudi Arabia on  
3 behalf of the privately owned Carlyle Group, the 11th largest defense contractor in the U.S. While  
4 there he meets privately with the Saudi royal family and the bin Laden family. [Source: Wall Street  
5 Journal, Sept. 27, 2001. See also FTW, Vol. IV, No 7 - "The Best Enemies Money Can Buy," -  
6 <http://www.fromthewilderness.com/members/carlyle.html>. ]

7  
8 7. January, 2001 - The Bush Administration orders the FBI and intelligence agencies to  
9 "back off" investigations involving the bin Laden family, including two of Osama bin Laden's  
10 relatives (Abdullah and Omar) who were living in Falls Church, VA - right next to CIA  
11 headquarters. This followed previous orders dating back to 1996, frustrating efforts to  
12 investigate the bin Laden family. [Source: BBC Newsnight, Correspondent Gregg Palast -  
13 Nov 7, 2001].

14  
15 8. Feb 13, 2001 - UPI Terrorism Correspondent Richard Sale - while covering a trial of  
16 bin Laden's Al Q'aeda followers - reports that the National Security Agency has broken bin Laden's  
17 encrypted communications. Even if this indicates that bin Laden changed systems in February it  
18 does not mesh with the fact that the government insists that the attacks had been planned for years.

19  
20 9. May 2001 - Secretary of State Colin Powell gives \$43 million in aid to the Taliban  
21 regime, purportedly to assist hungry farmers who are starving since the destruction of their opium  
22 crop in January on orders of the Taliban regime. [Source: The Los Angeles Times, May 22, 2001].

23  
24 10. May, 2001 - Deputy Secretary of State Richard Armitage, a career covert operative  
25 and former Navy Seal, travels to India on a publicized tour while CIA Director George Tenet makes  
26 a quiet visit to Pakistan to meet with Pakistani leader General Pervez Musharraf. Armitage has long  
27 and deep Pakistani intelligence connections and he is the recipient of the highest civil decoration  
28 awarded by Pakistan. It would be reasonable to assume that while in Islamabad, Tenet, in what was

described as "an unusually long meeting," also met with his Pakistani counterpart, Lt. General Mahmud Ahmad, head of the ISI. [Source The Indian SAPRA news agency, May 22, 2001.]

11. June 2001 - German intelligence, the BND, warns the CIA and Israel that Middle Eastern terrorists are "planning to hijack commercial aircraft to use as weapons to attack important symbols of American and Israeli culture." [Source: Frankfurter Allgemeine Zeitung, September 14, 2001.]

12. July, 2001 - Three American officials: Tom Simmons (former U.S. Ambassador to Pakistan), Karl Inderfurth (former Assistant Secretary of State for South Asian affairs) and Lee Coldren (former State Department expert on South Asia), meet with Pakistani and Russian intelligence officers in Berlin and tell them that the U.S. is planning military strikes against

Afghanistan in October. A French book released in November, "Bin Laden - La Verité Interdite," discloses that Taliban representatives often sat in on the meetings. British papers confirm that the Pakistani ISI relayed the

threats to the Taliban. [Source: The Guardian, September 22, 2001; the BBC, September 18, 2001. The Inter Press Service, Nov 16, 2001]

13. Summer, 2001 - The National Security Council convenes a Dabhol working group as revealed in a series of government e-mails obtained by The Washington Post and the New York Daily News. [Source: The Albion Monitor, Feb. 28, 2002]

14. Summer 2001 - According to a Sept. 26 story in Britain's The Guardian, correspondent David Leigh reported that, "U.S. department of defense official, Dr. Jeffrey Starr, visited Tajikistan in January. The Guardian's Felicity Lawrence established that US Rangers were also training special troops in Kyrgyzstan. There were unconfirmed reports that Tajik and Uzbek special troops were training in Alaska and Montana."

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15. Summer 2001 (est.) - Pakistani ISI Chief General Ahmad (see above) orders an aide to wire transfer \$100,000 to Mohammed Atta, who was according to the FBI, the lead terrorist in the suicide hijackings. Ahmad recently resigned after the transfer was disclosed in India and confirmed by the FBI. [Source: The Times of India, October 11, 2001.]

16. Summer 2001 - An Iranian man phones U.S. law enforcement to warn of an imminent attack on the World Trade Center in the week of September 9th. German police confirm the calls but state that the U.S. Secret Service would not reveal any further information. [Source: German news agency "online.de", September 14, 2001, translation retrieved from online.ie in Ireland.]

17. June 26, 2001 - The magazine indiareacts.com states that "India and Iran will 'facilitate' US and Russian plans for 'limited military action' against the Taliban." The story indicates that the fighting will be done by US and Russian troops with the help of Tajikistan and Uzbekistan. [Source: indiareacts.com, June 26, 2001.]

18. August 2001 - The FBI arrests an Islamic militant linked to bin Laden in Boston. French intelligence sources confirm that the man is a key member of bin Laden's network and the FBI learns that he has been taking flying lessons. At the time of his arrest the man is in possession of technical information on Boeing aircraft and flight manuals. [Source:

Reuters, September 13.]

19. August 11 or 12 - US Navy Lt. Delmart "Mike" Vreeland, jailed in Toronto on U.S. fraud charges and claiming to be an officer in U.S. Naval intelligence, writes details of the pending WTC attacks and seals them in an envelope which he gives to Canadian authorities. [Source: The Toronto Star, Oct. 23, 2001; Toronto Superior Court Records]

20. Summer 2001 - Russian intelligence notifies the CIA that 25 terrorist pilots have been specifically training for suicide missions. This is reported in the Russian press and news stories are

1 translated for FTW by a retired CIA officer.

2  
3 21. July 4-14, 2001 - Osama bin Laden receives treatments for kidney disease at the  
4 American hospital in Dubai and meets with a CIA official who returns to CIA headquarters on July  
5 15th. [Source: Le Figaro, October 31st, 2001.]

6  
7 22. August 2001 - Russian President Vladimir Putin orders Russian intelligence to warn  
8 the U.S. government "in the strongest possible terms" of imminent attacks on airports and  
9 government buildings. [Source: MS-NBC interview with Putin, September 15.]

10  
11 23. August/September, 2001 - The Dow Jones Industrial Average drops nearly 900 points  
12 in the three weeks prior to the attack. A major stock market crash is imminent.

13  
14 24. Sept. 3-10, 2001 - MS-NBC reports on September 16 that a caller to a Cayman Islands  
15 radio talk show gave several warnings of an imminent attack on the U.S. by bin Laden in the week  
16 prior to 9/11.

17  
18 25. September 1-10, 2001 - In an exercise, Operation "Swift Sword" planned for four  
19 years, 23, 000 British troops are steaming toward Oman. Although the 9/11 attacks caused a hiccup  
20 in the deployment the massive operation was implemented as planned. At the same time two U.S.  
21 carrier battle groups arrive on station in the Gulf of Arabia just off the Pakistani

22 coast. Also at the same time, some 17,000 U.S. troops join more than 23,000 NATO troops  
23 in Egypt for Operation "Bright Star." All of these forces are in place before the first plane hits the  
24 World Trade Center. [Sources: The Guardian, CNN, FOX, The Observer, International Law  
25 Professor Francis Boyle, the University of Illinois.]

26  
27 26. September 7, 2001 - Florida Governor Jeb Bush signs a two-year emergency  
28 executive order (01-261) making new provisions for the Florida National Guard to assist law



1 enforcement and emergency-management personnel in the event of large civil disturbances, disaster  
2 or acts of terrorism. [Source: State of Florida web site listing of Governor's Executive Orders.]

3  
4 27. September 6-7, 2001 - 4,744 put options (a speculation that the stock will go down)  
5 are purchased on United Air Lines stock as opposed to only 396 call options (speculation that the  
6 stock will go up). This is a dramatic and abnormal increase in sales of put options. Many of the  
7 UAL puts are purchased through Deutschebank/AB Brown, a firm managed until 1998 by the  
8 current Executive Director of the CIA, A.B. "Buzzy" Krongard. [Source: The Herzliyya  
9 International Policy Institute for Counterterrorism, <http://www.ict.org.il/>, September 21; The New  
10 York Times; The Wall Street Journal.]

11  
12 28. September 10, 2001 - 4,516 put options are purchased on American Airlines as  
13 compared to 748 call options. [Source: ICT - above]

14  
15 29. September 6-11, 2001 - No other airlines show any similar trading patterns to those  
16 experienced by UAL and American. The put option purchases on both airlines were 600% above  
17 normal. This at a time when Reuters (September 10) issues a business report stating, "Airline stocks  
18 may be poised to take off."

19  
20 30. September 6-10, 2001 - Highly abnormal levels of put options are purchased in  
21 Merrill Lynch, Morgan Stanley, AXA Re(insurance) which owns 25% of American Airlines, and  
22 Munich Re. All of these companies are directly impacted by the September 11 attacks. [Source:  
23 ICT, above; FTW, Vol. IV, No.7, October 18, 2001, [http://www.fromthewilderness.com/](http://www.fromthewilderness.com/members/oct152001.html)  
24 members/oct152001.html. ]

25  
26 31. It has been documented that the CIA, the Israeli Mossad and many other intelligence  
27 agencies monitor stock trading in real time using highly advanced programs reported to be  
28 descended from Promis software. This is to alert national intelligence services of just such kinds of

1 attacks. Promis was reported, as recently as June, 2001 to be in Osama bin Laden's possession and,  
2 as a result of recent stories by FOX, both the FBI and the Justice Department have confirmed its use  
3 for U.S. intelligence gathering through at least this summer. This would confirm that CIA had  
4 additional advance warning of imminent attacks. [Sources: The Washington Times, June 15, 2001;  
5 FOX News, October 16, 2001; FTW, October 26, 2001,  
6 -[http://www.fromthewilderness.com/members/magic\\_carpet.html](http://www.fromthewilderness.com/members/magic_carpet.html); FTW, Vol. IV, No.6, Sept. 18,  
7 2001 -<http://www.fromthewilderness.com/members/sept1801.html>; FTW, Vol. 3, No 7, 9/30/00 -  
8 [http://www.fromthewilderness.com/free/pandora/052401\\_promis.html](http://www.fromthewilderness.com/free/pandora/052401_promis.html).  
9

10 32. September 11, 2001 - Gen Mahmud of the ISI (see above), friend of Mohammed Atta,  
11 is visiting Washington on behalf of the Taliban. He is meeting with the Chairmen of the House and  
12 Senate Intelligence Committees, Porter Goss (R), FL and Bob Graham (D), FL [Sources: MS-NBC,  
13 Oct. 7, The New York Times, Feb. 17, 2002.]  
14

15 33. September 11, 2002 - Employees of Odigo, Inc. in Israel, one of the world's largest  
16 instant messaging companies, with offices in New York, receive threat warnings of an imminent  
17 attack on the WTC less than two hours  
18

19 before the first plane hits the WTC. Law enforcement authorities have gone silent about any  
20 investigation of this. The Odigo Research and Development offices in Israel are located in the city  
21 of Herzliyya, a ritzy suburb of Tel Aviv which is the same location as the Institute for Counter  
22 Terrorism which breaks early details of insider trading on 9-11. [Source: CNN's Daniel Sieberg,  
23 9/28/01; Newsbytes, Brian McWilliams, 9/27/01; Ha'aretz, 9/26/01.].  
24

25 34. September 11, 2001, For 50 minutes, from 8:15 AM until 9:05 AM, with it widely  
26 known within the FAA and the military that four planes have been simultaneously hijacked and  
27 taken off course, no one notifies the President  
28

of the United States. It is not until 9:30 that any Air Force planes are scrambled to intercept,  
but by then it is too late. This means that the National Command Authority waited for 75 minutes

1 before scrambling aircraft, even though it was known that four simultaneous hijackings had  
2 occurred - an event that has never happened in history. [Sources: CNN, ABC, MS-NBC, The Los  
3 Angeles Times, The New York Times.]  
4

5 35. September 13, 2001 - China is admitted to the World Trade Organization quickly,  
6 after 15 years of unsuccessful attempts. [Source: The New York Times, Sept. 30, 2001.]  
7

8 36. September 14, 2001 - Canadian jailers open the sealed envelope from Mike Vreeland  
9 in Toronto and see that it describes attacks against the WTC and Pentagon. The U.S. Navy  
10 subsequently states that Vreeland was discharged

11 as a seaman in 1986 for unsatisfactory performance and has never worked in intelligence.  
12 [Source: The Toronto Star, Oct. 23, 2001; Toronto Superior Court records]  
13

14 37. September 15, 2001 - The New York Times reports that Mayo Shattuck III has  
15 resigned, effective immediately, as head of the Alex (A.B) Brown unit of Deutschebank.  
16

17 38. September 29, 2001 - The San Francisco Chronicle reports that \$2.5 million in put  
18 options on American Airlines and United Airlines are unclaimed. This is likely the result of the  
19 suspension in trading on the NYSE after the attacks which gave the Securities and Exchange  
20 Commission time to be waiting when the owners showed up to redeem their put options.  
21

22 39. October 10, 2001 - The Pakistani newspaper The Frontier Post reports that U.S.  
23 Ambassador Wendy Chamberlain has paid a call on the Pakistani oil minister. A previously  
24 abandoned Unocal pipeline from Turkmenistan, across Afghanistan, to the Pakistani coast, for the  
25 purpose of selling oil and gas to China, is now back on the table "in view of recent geopolitical  
26 developments."  
27

28 40. October 11, 2001 - The Ashcroft Justice Department takes over all terrorist

1 prosecutions from the U.S. Attorneys office in New York which has had a highly successful track  
2 record in prosecuting terrorist cases connected to Osama bin Laden. [Source: The New York Times,  
3 Oct. 11, 2002.]

4  
5 41. Mid October, 2001 - The Dow Jones Industrial Average, after having suffered a  
6 precipitous drop has recovered most of its pre-attack losses. Although still weak, and vulnerable to  
7 negative earnings reports, a crash has been averted by a massive infusion of government spending  
8 on defense programs, subsidies for "affected" industries and planned tax cuts for  
9 corporations.

10  
11 42. November 21, 2001 - The British paper The Independent runs a story headlined,  
12 "Opium Farmers Rejoice at the Defeat of the Taliban." The story reports that massive opium  
13 planting is underway all over the country.

14  
15 43. November 25, 2001 - The Observer runs a story headlined "Victorious Warlords Set  
16 To Open the Opium Floodgates." It states that farmers are being encouraged by warlords allied with  
17 the victorious Americans are "being encouraged to plant "as much opium as possible."

18  
19 44. December 4, 2001 - Convicted drug lord and opium kingpin Ayub Afridi is recruited  
20 by the US government to help establish control in Afghanistan by unifying various Pashtun  
21 warlords. The former opium smuggler who was one of the CIA's leading assets in the war against  
22 the Russians is released from prison in order to do this. [Source: The Asia Times Online, 12/4/01].

23  
24 45. December 25, 2001 - Newly appointed afghani Prime Minister Hamid Karzai is  
25 revealed as being a former paid consultant for Unocal. [Source: Le Monde.]

26  
27 46. January 3, 2002 - President Bush appoints Zalamy Khalilzad as a special envoy to  
28 Afghanistan. Khalilzad, a former employee of Unocal, also wrote op-eds in the Washington Post in

1 1997 supporting the Taliban regime. [Source: Pravda, 1/9/02]

2  
3 47. January 4, 2002 - Florida drug trafficking explodes after 9-11. In a surge of trafficking  
4 reminiscent of the 1980s the diversion of resources away from drug enforcement has opened the  
5 floodgates for a new surge of cocaine and heroin from South America. [The Christian Science  
6 Monitor, January 4, 2002.

7  
8 48. January 10, 2002 - In a call from a speaker phone in open court, attorneys for "Mike"  
9 Vreeland call the Pentagon's switchboard operator who confirms that Vreeland is indeed a Naval  
10 Lieutenant on active duty. She provides an office number and a direct dial phone extension to his  
11 office in the Pentagon. [Source: Attorney Rocco Galati; court records Toronto Superior Court.]

12  
13 49. January 10, 2002 - Attorney General John Ashcroft recuses himself from the Enron  
14 investigation because Enron had been a major campaign donor in his 2000 Senate race. He fails to  
15 recuse himself from involvement in two sitting Federal grand juries investigating bribery and  
16 corruption charges against ExxonMobil and BP-Amoco who have massive oil interests in Central  
17 Asia. Both were major Ashcroft donors in 2000. [Source: CNN, Jan. 10, 2002 - FTW original  
18 investigation, The Elephant in the Living Room, Part I, Apr 4, 2002.]

19  
20 50. February 9, 2002 - Pakistani leader General Musharraf and Afghan leader Hamid  
21 Karzai announce their agreement to "cooperate in all spheres of activity" including the proposed  
22 Central Asian pipeline. Pakistan will give \$10 million to Afghanistan to help pay Afghani  
23 government workers. [Source:

24 The Irish Times, 2/9/02]

25  
26 51. Feb 18, 2002 - The Financial Times reports that the estimated opium harvest in  
27 Afghanistan in the late Spring of 2002 will reach a world record 4500 metric tons.

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PUBLIC TIMELINE: DEPARTMENT OF ENERGY SLUSH-FUND CLEANTECH  
CRASH SCANDAL CASE FILE REFERENCE NUMBERS

Rules: You may only add items that are clearly visible as facts in public university research libraries and on, at least, 5 or more public online or hard-copy newspapers. Include links, book references by ISBN # and video dates in your submissions for related archives. Items without validation evidence will be removed. No more than three sentences per item. Let's aim for daily additions. Item numbers are produced with a BATES NUMBERING" reference code to support federal and media investigators case files. Item numbers are generated upon acceptance by the jury team. All submissions are copied to law enforcement and related investigators. Submit your item proposals via the usual SOMO process. ("Ref:" links) may, or may not, include the validation facts that you send. ("Ref" links) may include already posted material, to save time. Volunteers will detail the reference links out as time allows.

89008900.09 - Earlier Timeline Elements Sub-level Page 1 (SEE THIS LINK) more references coming"

002378.01 - Arnold Schwarzenegger, and his handlers, establish relationships with Russian leaders and businessmen during production of his action film in Russia. Connections: 100457.08; Ref: [A] [B] [C] [D] [E] [F] [G] [I] [J] [K] [L] more references coming"

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007799088.09 - Arnold Schwarzenegger's handlers begin telling him that his name recognition could allow him to become governor of California. Ref: [M] [N] [O] [P] [Q] [R] [S] [T] more references coming"

100678.04 - 9/11 Tragedy Takes Place. Ref:

368780.09 - Largest "Black Budget" increase in history is authorized. Per Snowden, Assange, Greenwald: "Targets every device on Earth that uses electricity." Later found to have recorded Dept. of Energy staff crimes and insider deals. FOIA's launched. Ref: [U] [V] [W] [X] [Y] [Z] [A1] [A2] [A3] [A4] [A5] [A6] [A7] [A8] more references coming"

899901.87 - USGS, CIA , BP, etc., survey's report analysis that Afghanistan holds "Over \$1 Trillion key minerals for a certain type of electric car and solar panel manufacturing. Ref: [A9] [A10] [A11] [A12] [A13] [A14] [A15] [A16] [A17] [A18] [A19] [A20] [A21] [A22] [A23] [A24] [A25] [A26] [A27] [A28] [A29] [A30] [A31] more references coming"

780557.89 - Goldman Sachs launches extensive Afghan mining, policy connections, intel acquisition programs and begins marketing lithium and indium related afghan mining deals to tier 1 investor groups. Happens to be same materials that DOE funding "winners" need and certain Senators have family insider trading investments in. Ref: [A41] [A42] [A43] [A44] [A45] [A46] [A47] [A48] [A49] [A50] [A51] [A52] [A53] [A54] [A55] [A56] [A57] [A58] [A59] [A60] [A61] [A62] [A63] [A64] [A65] [A66] [A67] [A68] [A69] [A70] [A71] [A72] [A73] [A74] [A75] [A76] [A77] [A78] [A79] [A80] [A81] [A82] [A83] [A84] [A85] [A86] [A87] [A88] [A89] [A90] [A91]

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1 [A92] [A94] [A95] [A96] more references coming"

2  
3  
4 654800.45 - Nuclear industry lobby creates and applies for funds in Dept. of Energy Loan  
5 Guarantee Cash Program (LGP). Ref: [A102] [A103] [A104] [A105] [A106] [A107] [A108] [A109]  
6 [A110] [A111] [A112] [A113] [A114] [A115] [A116] [A117] [A118] [A119] [A120] [A121]  
7 [A122] [A123] [A124] [A125] [A126] more references coming"

8  
9  
10 7758895.02 - Detroit auto industry lobby creates and assumes award of Dept. of Energy  
11 Advanced Technology Vehicle Manufacturing Cash Program (ATVM), which, per draft, only  
12 Detroit "Big 3" are qualified to win. more references coming"

13  
14  
15 67990089.23 - Senator Bingamans office spots exclusive kick-back structure in ATVM  
16 (7758895.02) and adds back-door to bill to allow ANY American car company to apply for funds,  
17 not just Detroit Big 3. more references coming"

18  
19  
20 457986.56 - ATVM bill is approved by Congress, creating first-ever opening for non-Detroit  
21 controlled Domestic car companies to get funded. more references coming"

22  
23  
24 100457.08 - Arnold Schwarzenegger takes newer Silicon Valley Vc's to Russia to meet his  
25 business contacts

26  
27  
28 4579009.89 - Tesla is gifted ATVM funds without meeting qualifications. All Tesla related



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1 investors & Sachs provide campaign funds.

2  
3  
4 3446899.08 - Detroit realizes there is a back-door in the bill and tries to get entire bill  
5 pulled.

6  
7  
8 888004466.01 - In late night Congressional session, Detroit fails to get bill pulled as  
9 lobbyists give up via threats to expose the kick-back structure of the original draft.

10  
11  
12 66895570.99 - Chicago's Barack Obama wins presidential election.

13  
14  
15 68055690.89 - Campaign "handlers" David Axelrod, Rahm Emanuel, Steve Rattner, Robert  
16 Gibbs receive key White House positions.

17  
18  
19 457899000.88 - Chicago's Argonne National Labs is named point for ATVM loan review  
20 and also receives point designation as lithium battery development center. White House Chief of  
21 Staff, Rahm Emanuel facilitates.

22  
23  
24 556008790.78 - Federal & media investigators open early-stage case files.

25  
26  
27 22267889.00 - IBM Consulting opens "special review office" for DOE, in Virginia, where  
28 DOE funding applications are "custom processed".

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88667789.02 - Solyndra's, Abound's, Ener1's, Fiskers's, Nissan's and Tesla's investors acquire largest investment options in Afghan mining product chain, facilitated by Goldman Sachs, in American history.

67789000.00 - Diane Feinstein arranges real estate deal for Solyndra and Tesla. Her husband's firm: CBRE Real Estate, comes under investigation.

4570077888.88 - 89668890.00 - David Axelrod, Rahm Emanuel, Steve Rattner, Robert Gibbs are advised that investigations have begun.

89668890.00 - David Axelrod, Rahm Emanuel, Steve Rattner, Robert Gibbs resign from White House.

668955778.98 - Dianne Feinsteins staff leave her office to go work for Tesla and Solyndra.

66805678.00 - Steve Rattner indicted for Securities & Investment Fraud in NY

77995578.00 - Russian lithium and mineral mining companies partner with Silicon Valley VC's who "won" DOE cash.

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1  
2 7780087449.00 - Federal investigators report that Russian executives at DOE funding  
3 groups Severstal, Ener1 and others are on "watch-list".  
4

5  
6 5578000677.00 - IBM Consulting fired from DOE review program. Investigations on their  
7 actions begin.  
8

9  
10 66890088.00 - Dept. of Energy funding ordered to be frozen. No American small business  
11 ever receives any funding from program. All recipients turn out to be campaign financiers.  
12

13  
14 6780098560.00 - Key Dept. of Energy "winning" VC's indicted for tax fraud.  
15

16  
17 567890000.89 - Solyndra, Abound, Ener1, Fisker, and others go bankrupt. Largest ratio of  
18 taxpayer funded, big-ticket, same industry bankruptcies in American history. All used Afghan  
19 minerals.  
20

21  
22 6699556789.05 - Investigations begin into Silicon Valley VC's use of tax-write offs from  
23 DOE bankruptcy in order to acquire overall profits from losses. Silicon Valley VC's make tax write-  
24 off profits on taxpayers multi-\$Billion loss.  
25

26  
27 446899667.99 - Goldman Sachs found to have interceded on almost every single Dept. of  
28 Energy LG and ATVM funding "winner" lobbying.

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34579976699.00 - Bright Automotive, and other Dept. of Energy applicants, begin publishing open letters, in the press, denouncing the crooked nature of Dept. of Energy funding.

5567907689.00 - Rahm Emanuels D.O.E. "do not fund" list, from his White House tenure is noted by multiple ex-WH staff.

5679997656.00 - Senate investigators, agency investors and investigative media charge DOE, under Steven Chu, with running a "fraud", "embezzlement", "kick-back scheme".

6689955778.00 - Snowden revelations

8995688900.78 - Cross indexing of Snowden documents by reporters finds confirming set of names in same programs.

5579095657.99 - Massive number of main stream journalists depart large newspapers and cable news to start their own independent digital newspapers. Golden Age of New Media begins. Cover-ups fall apart in rapid succession.

334679990.00 - Detroit Auto heads begin resigning or getting fired as they realize investigations are getting close.

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22568900.05 - U.S./Russia relations collapse. Silicon Valley/Russian deals eyed. Russian tipsters approach new media press with revelations as payback for their fallout from back-outs by Silicon Valley VC's and their companies: Space X, Tesla, lithium, solar, etc.

457890995.78 - Robert Gibbs protege, Jay Carney, resigns from White House.

65579966.67 - "Lines-of-connection" investigations reveal that TARP/DOE funding "winners; campaign financiers and profiteers are ALL THE SAME PEOPLE.

6689900088.00 - Tesla faces extensive lawsuits & charges. Begins buying real estate as investor back-up assets for possible off-books tax write-off spin if they are forced to declare bankruptcy. Those in WH, formerly protecting Tesla have left, or are leaving.

7780086567-00 - VA Scandal/D-Day Event refocuses attention back on Afghanistan and Middle East toxic poisoning of Vets from exposure.

6689000844.78 - Afghan prisoner scandal refocuses attention back on Afghanistan.

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2  
3 THE FORBIDDEN TESLA TIMELINE THAT MUSK'S COVER-UP PEOPLE DON'T  
4 WANT YOU TO SEE:  
5

6 Derived from RICO CASE FILE #456-D-hj45A and Tesla Employee Testimony. 15 Tesla  
7 employees have provided every company email since 2003, between all suppliers, investors and  
8 third parties. (Their hard drives did not crash). All of this information can be independently verified  
9 with minor research and interviews.  
10

11 HIGHLIGHTS:  
12

13 (Full Timeline is 42 pages long)  
14

15 1880's- Detroit Electric sells Electric cars commercially  
16

17 1900-  
18

19 38 percent of US automobiles are powered by electricity, but as Henry Ford designed the  
20 much cheaper T-Ford, the electric cars began to disappear.  
21

22 1970 -  
23

24 The price of gasoline hits record because of a series of energy crises, so the interest in  
25 electric cars increased again.  
26

27 1971 -  
28

Pg 1925 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 In June Elon Musk was born into a highly dysfunctional, racist, family.

2

3 1996-1999 -

4

5 General Motors produced an electric car called EV1 and leased it to customers.

6

7 1999 -

8

9 Elon Musk sold his company Zip2, which he founded with his daddy's dirty mining money,  
10 and made \$22 million. He founded X.com that would become PayPal.

11

12 2002 -

13

14 eBay acquired PayPal and Elon Musk made \$165 million.

15

16 2003 - General Motors cancelled the lease program and removed the last EV1 from the  
17 streets. They said they couldn't sell enough of the cars to make the EV1 profitable.

18

19 July. Martin Eberhard and Marc Tarpenning incorporated Tesla Motors. They had earlier  
20 made a feasibility study to see if they could make an electric car. They now made a feasibility study  
21 together with AC Propulsion to see if the batteries would work.

22

23 November. The 2 employees searched for a partner to build the rest of the car. Lotus became  
24 their choice. Lotus engineers, from England, agree to provide chassis of car.

25

26 2004 -

27

28 February. Ian Wright, who had met Martin Eberhard while on a plane, joined the company.

1 They finished business plan 1.0. Ian later leaves Tesla in disgust when he realizes what they are up  
2 to

3  
4 March. Starting a car company is expensive, so they began to look for outside investors.  
5 Silicon Valley VC's discuss having Elon Musk take-over Tesla and get rid of the founders

6  
7 April. Series A funding where Elon Musk was the main investor. Elon Musk had earlier  
8 aligned with JB Straubel, as his directed mole, who had friends at AC Propulsion, and the VC's told  
9 Elon Musk to contact Tesla. Other investors included SDL Ventures and Compass Technology  
10 Partners. JB Straubel joined the company as employee number 5.

11  
12 May. An early styling study began at Tesla.

13  
14 June. A technology implementation study began.

15  
16 July. Tesla had 9 employees and moved to an office in San Carlos, California. They also  
17 made a "mule" which is a car that doesn't reproduce but you can see if the concept works. This fake  
18 "mule" car is shown as a real sellable car to DOE and investors, when, in fact, it is not

19  
20 October. The 15 employees began to design the drivetrain component.

21  
22 November. They installed the drivetrain in the Mule 1.

23  
24 December. Tesla couldn't use the same design as the Lotus Elise, so they had a contest  
25 where Barney Hatt made the best design by copying most of the Lotus Elise so they would not have  
26 to pay Lotus the full licensing costs.

27  
28 2005 -



Pg 1927 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1  
2 January. They made a 1/4 scale model in clay of the design Barney Hatt had made. Tesla  
3 had now 18 employees and they also took out Mule 1 for a test drive but it was not legal to be  
4 driven on any road.  
5

6 February. The now 23 employee strong company needed more money, so they made a series  
7 B funding. Not only Elon Musk invested more money, but also Valor Equity Partners. Tesla also  
8 opened an office in UK close to the Lotus office to try to tie into Lotus. Lotus is leery.  
9

10 April-June. Tesla made a full-scale model in clay of the Tesla Roadster.  
11

12 July. With 38 employees, they now tested a plastic model of the Roadster in a wind tunnel.  
13

14 August. Some of the 41 employees began developing a motor.  
15

16 December. 63 employees and they began to build the Mule 2 in fiberglass.  
17

18 2006 -  
19

20 January. A drivable Mule 2 was finished but it still isn't a production car and it is not legal  
21 for sale or driving on the road.  
22

23 April. The engineers thought the Roadster was finished so they made 10 engineering  
24 prototypes (EP), which compared to a Mule can (in theory) be produced.  
25

26 May. 92 employees and they finished the first EP, called EP 1. Tesla raised a series C round  
27 led by Vantage Point Partners and Elon Musk.  
28

1 July. Almost no-one knew that Tesla existed, until now when Tesla showed EP 1 and EP 2  
2 in Santa Monica, California.

3  
4 August. 100 employees. Tesla crast tests and technical reports reveal fire dangers. Tesla  
5 senior staff orders the reports shredded. them. Tesla had earlier crashed a few virtual cars, but they  
6 needed to know if the computers models were accurate. They also began to show the Roadster at  
7 events to market it.

8  
9 August. Elon Musk, John Doerr, Rahm Emanuel, Robert Gibbs and David Axelrod discuss a  
10 quid-pro-quo scheme to advance money for the Presidential and Senate campaigns and get paid  
11 back in spades from TARP and Dept. of Energy "Loans", tax credits, stock perks and monopolies.

12  
13 September. 120 employees. They made more tests, including radiated emissions and  
14 susceptibility testing. EMF emissions during charging were high and those reports were ordered  
15 shredded

16  
17 October. They made a durability test, which consists of driving the Roadster on a  
18 cobblestone racetrack. The idea is to simulate 100,000 miles in 6 months. It would have taken much  
19 longer time to drive the same distance on a smooth road. Tesla realized that their computer models  
20 were inaccurate - the Roadster's transmission didn't survive the durability test. Tesla is warned, by  
21 Detroit UAW executives that everything they are doing is wrong, wasting tens of millions of dollars  
22 and could damage the overall auto industry. Musk hates unions and pledges to keep unions out. He  
23 ignores the advice due to narcissism issues.

24  
25 November 2004. 144 employees, and more tests, including driving through a saltwater bath.

26  
27 December. They showed the EP 2 at the Los Angeles Auto Show.  
28

Pg 1929 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 2007 -

2

3 January. Tesla brought the Roadster to Arvidsjaur, Sweden, to see if it could survive winter  
4 conditions. It had severe charging issues

5

6 February. 205 employees. Tesla began to build a validation prototype (VP), where they took  
7 everything they learned from the engineering prototype. Tesla says it will build a \$35 million plant  
8 in Albuquerque, to produce the Model S. They lied.

9

10 March. 230 employees and they finished the VP 1.

11

12 April. In dire finances, Tesla raised more money - a series D round led by Elon Musk,  
13 Technology Partners, and Vantage Point.

14

15 June. Tesla's motor factory in Taiwan was finished and it began producing parts.

16

17 July. A new transmission was somewhat finished but still has ongoing problems.

18

19 August. Tesla finished the VP 10. CEO Martin Eberhard was replaced by Tesla investor.  
20 Tesla's are now \$100,000.00 over budget PER CAR Michael Marks, hired, who would wprk as an  
21 interim-CEO until Tesla found a long-term CEO.

22

23 September. Tesla delayed the launch of the Roadster because they needed more time to test  
24 its durability.

25

26 October. Tesla transmission failed in the durability tests. Massive engineering failures are  
27 piling up. Tesla needed yet another transmission.

28

Pg 1930 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 November. Actual Tesla Martin Eberhard is forced out of the company after confronting  
2 Elon Musk regarding Musk's manipulations. Musk orders his PR group to launch character  
3 assassination campaign against Eberhardt

4  
5 December. Interim CEO Michael Marks see the lies and leaves and is replaced by interim  
6 CEO Ze'ev Drori. Bernard Tse is contracted, by Tesla, to hide the Tesla battery explosion  
7 documents that have been uncovered.

8  
9 December. Tesla says it will build it;s factory in Southern California. They lied.

10  
11 December. Sex worker hired by Musk attempts blackmail. Lawyers shut her down

12  
13 2008 -

14  
15 January. 260 employees. The VPs survived the new tests, so the Roadster was finished -  
16 except for the transmission. Tesla accountants notify Musk of impending bankruptcy. Tesla makes  
17 customers sign confidentiality agreements to keep from disclosing extensive defects and price  
18 changes that are constantly occurring.

19  
20 March. Tesla began production of the Roadster. Elon Musk cheating on wife and kids with  
21 B-movie actress.

22  
23 April. Tesla can't get fleet orders or sell. Bankruptcy imminent. Short term cash put in by a  
24 bridge financing led by Elon Musk and Valor Equity Partners.

25  
26 May. Opened a retail store in Los Angeles, and they also finished a new transmission.

27  
28 June. Opened a second retail store in Menlo Park, California, and they also delivered the

Pg 1931 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 first Roadster to the customers. Marc Tarpenning is sickened by the Musk plot and resigns from  
2 Tesla after getting a payout to keep quiet. The Model S was announced in a press release.

3  
4 August. Franz von Holzhausen joined Tesla Motors as Chief Designer.

5  
6 October. Elon Musk became the CEO so as to control all information in and out of Tesla and  
7 prevent disclosure of organized crime funding. Tesla bankrupt on paper but cooking books to hide  
8 financial disaster.

9  
10 October. Tesla tells White House and DOE, In writing, it will sell 200,000 cars by 2010  
11 December. White House staff order Dept. of Energy to only fund companies from their "special list"  
12 of campaign backers

13  
14 December. Google investirs and executives become key shareholders in Tesla and agree to  
15 control all media to benefit Tesla

16  
17 December. Tesla says it will build it's factory in San Jose, CA. It lied and it is discovered  
18 that all of the different failed factory location announcements have to do with Dianne Feinstein's  
19 husband's screwed up real estate deals.

20  
21 November. Tesla revealed it had requested about \$400 million in loans for the Model S and  
22 powertrain manufacturing, under the Department of Energy's Advanced Technology Vehicles  
23 Manufacturing (ATVM) program.

24  
25 2009 -

26  
27 March. Tesla unveiled two Model S prototypes at the Los Angeles headquarters of Tesla  
28 CEO Elon Musk's other startup, SpaceX. Tesla had decided to build a design studio at the factory.

Pg 1932 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 Tesla began taking reservations for the Model S. More than 500 tesla investor connected people  
2 reserved a car in the first week in order to fake sales volume.

3  
4 June. Tesla gets approval for \$465 million in low-interest loans from the Department of  
5 Energy in exchange for campaign funding provided by Tesla and Google VC's. Tesla has written  
6 over 30 lies in it's Dept. of Energy Application, which Steven Chu is aware of,yet ignores, at White  
7 House request.

8  
9 2010 -

10  
11 January. Tesla registered for an initial public offering of stock. Tesla uses "free" taxpayer  
12 loan to exploit taxpayer dollars to fake the value of it's stock while also receiving free tax credits  
13 which it sells at a profit in exchange for campaign funds, thus fully qualifying as an organized crime  
14 operation. This is SEC stock fraud but charges are held on special request of WH

15  
16 February- Dianne Feinstein and Her real estate mogul husband manipulate the Solyndra and  
17 NUMMI/Tesla factory properties for personal profit in exchange for campaign funding

18  
19 May. Tesla bought NUMMI with taxpayer money - the former Toyota and General Motors  
20 factory in Fremont (manipulated by Feinstein), California, for \$42 million. Toyota Motor and Tesla  
21 announced they will cooperate on electric vehicle development. Toyota purchased Tesla shares.

22  
23 June. 800 employees. Tesla shares began trading on the Nasdaq Stock Exchange. They  
24 gained 40.5 percent from Google media PR manipulations and use of the free taxpayer money to  
25 manipulate the stated value.

26  
27 2011 -  
28

Pg 1933 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 January. White House staff order Tesla to: "never go bankrupt until after our administration  
2 is out of office", says they will finesse any problems until then.

3  
4 Fires start to show up in Tesla tests and car operations

5  
6 2012 -

7  
8 January. Tesla ended production of the Roadster to focus on the Model S.

9  
10 First factory fire documented and covered up

11  
12 Previously, three key Tesla executives, who were studying the engineering failures, were  
13 killed in the same plane crash. Documents from one of the deceased executives are received by  
14 reporters. Family, or friends, of the victim are thought to be whistle-blowing

15  
16 February. Tesla revealed the Model X - a small SUV and says it will go on sale in early

17  
18 2012 -

19  
20 The Model S was officially launched at the Fremont NUMMI factory on land next door to  
21 Solyndra, both companies have numerous business connections to Sen. Feinstein. factory. Retail  
22 deliveries of the Model S started in the United States.

23  
24 September. Unveiled the Supercharger network.

25  
26 2013 -

Pg 1934 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 August. First Model S in Europe. Tesla formalizes relationship with Panasonic for batteries  
2 even as Panasonic is being charged with organized crime, price fixing, dumping and the deaths of  
3 thousands of factory workers and nearby neighbors to the factories.

4  
5 Tesla/Panasonic "Gigafactory" plan charged with exploiting Mexican workers with lethal  
6 work environment, toxic poisoning, nearby dangers to towns.

7  
8 Musk is caught on recorded audio and video admitting that Tesla was broke when it applied  
9 for Dept. of Energy funds, thus breaking the Section 136 federal law for the ATVM and LGP loans.

10  
11 Hackers designate Tesla as "The most easily hacked car in the world". Fears of  
12 eavesdropping and forced battery overload attacks

13  
14 September. Shadow team of special investigators document over 30 federal crimes that  
15 Tesla, and Tesla investors, engaged in. Federal law enforcement is ordered to: "Leave Tesla alone  
16 for now".

17  
18 2019 -  
19  
20

21 Musk's father revealed as parent to multiple bastard children and exposed as pedo who got  
22 Musk's sister pregnant. History of racism and anti-black culture in Musk family exposed in multiple  
23 racism lawsuits by black Musk employees.

24  
25  
26 2021 -  
27

28 Massive number of safety defect lawsuits, security lie lawsuits and other lawsuits now filed



Pg 1935 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH

1 against Musk, Tesla, SpaceX and Neurolink (Animal Torture).

2

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## **EXHIBITS 76 - Press Coverage Of The Case**

The government has spent over \$5M+ covering-up and obfuscating this case that every reporter, and millions of voters already know about.

Why are our government officials wasting time and taxpayer dollars on a matter they can easily settle for far, far, less money and hassle?

Pg 1937 - EXHIBIT 78 - Norcal 9<sup>th</sup> District- 22-cv-1107-TSH



## Afghanistan: The Saudi Arabia of Lithium?

**Lithium, which is from mobile phone nation's economy.**

By JAMES RISEN  
Published: June 13, 2010

WASHINGTON — The United States has discovered nearly \$1 trillion in untapped mineral deposits in [Afghanistan](#), far beyond any

As of late February, the U.S. held Ener1 Group, which is trying to emerge from bankruptcy — is held by Bzinfin, a British Virgin Islands company whose "indirect beneficial owner" is Boris Zingarevich, a Russian businessman. Zingarevich has close ties to Russian President Dmitry Medvedev and Prime Minister Vladimir Putin.

### Investing in Lithium Mining Stocks

**How To Profit from the Lithium Boom**

By Brian Hicks  
Friday, October 16th, 2009

Editor's Note:

While Western Lithium remains a hot trade — and possibly a third — opportunity to double if not triple.

**Green power corrupts**

June 05, 2012 - 8:00 PM

**Goldman Sachs culture 'toxic'?  
Letter confirms suspicions about  
Wall Street.**

A123 lithium-ion battery maker bankruptcy fuels criticism of President Barack Obama's alternative

Energy & Genius

### The Saudi Arabia of Lithium

Brendan I. Koerner, 10.30.08, 06:00 PM EST  
Forbes Magazine dated November 24, 2008

The gas engine made petroleum the world's biggest commodity. The electric car could do the same for the third element on the periodic table.

### Ener1 Wants to Win Lithium Ion Battery Race

Share Tweet StumbleUpon

U.S. Identifies Vast Mineral Riches in Afghanistan



### The problem with lithium

David Booth, National Post

**RUSSIAN  
OWNED**

Goldman Sachs discloses ownership in Talison Lithium Corp.

Talison Lithium Ltd's

N  
chloride ring SQM  
creating the illucid  
the ultra-arid sala

Image: CarSpace

Lithium ion battery manufacturer Ener1 (HEV) could become the country's first lithium ion battery mass producer—if it wins a \$480M Department of Energy loan. [CNNMoney](#) has more:







## TESLA IS A "DEATH CAR"

[Father of Tesla driver: 'Had she been in another vehicle she would have been alive'](#)

Indianapolis Star

Tesla itself was the target of a National Highway Transportation Safety Agency investigation after a series of battery fires in 2013 Model S vehicles.

Father of Tesla driver: 'Had she been in another vehicle she would have been alive'

Energy & Genius

### The Saudi Arabia of Lithium

Brendan I. Koerner, 10.30.08, 06:00 PM EST  
Forbes Magazine dated November 24, 2008

The gas engine made petroleum the world's biggest commodity. The electric car could do the same for the third element on the periodic table.



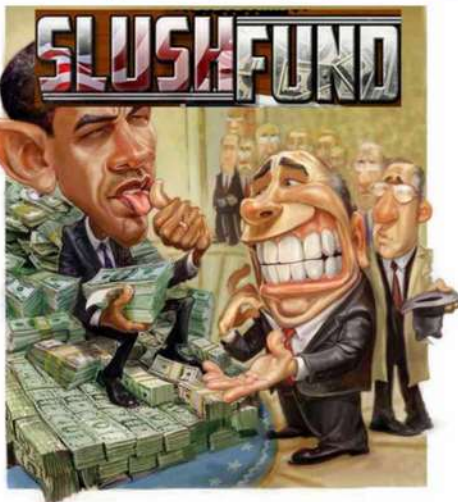
60 Shiga Shuiku / Aqueous / Redox  
Mounds of magnesium  
chloride ring SOM's mine,  
creating the illusion of snow in  
the ultra-arid solar.

The gas engine made petroleum the world's biggest commodity. The electric car could do the same for the third element on the periodic table.

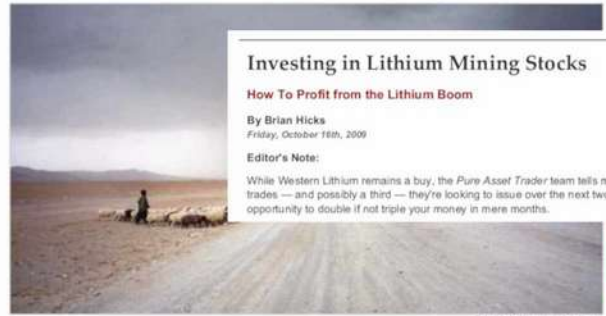
Nothing grows in the heart of the Salar de Atacama, this ancient Chilean lake bed 700 miles north of Santiago may be the driest place on Earth, a wasteland



This is the Tesla battery inside the MILITARY-GRADE BLAST CHAMBER that it must be used in at the Tesla Factory because of the EXTREME EXPLOSION DANGER of the Tesla Battery



## U.S. Identifies Vast Mineral Riches in Afghanistan



### Investing in Lithium Mining Stocks

How To Profit from the Lithium Boom

By Brian Hicks  
Friday, October 16th, 2009

Editor's Note:

While Western Lithium remains a buy, the Pure Asset Trader team tells me it trades — and possibly a third — they're looking to issue over the next two weeks opportunity to double if not triple your money in mere months.

A black Ghazni Province seems to offer little, but a Pentagon study says it may have among the world's largest deposits of lithium.

By JAMES ROSEN  
Published June 13, 2010

WASHINGTON — The United States has discovered nearly \$1 trillion in untapped mineral deposits in Afghanistan, far beyond any previously known reserves and enough to fundamentally alter the Afghan economy and perhaps the Afghan war itself, according to

RECOMMEND  
TWITTER  
COMMENTS  
(1460)

Discovera News - Earth News - Afghanistan: The Saudi Arabia of Lithium?

### Afghanistan: The Saudi Arabia of Lithium?

Lithium, which is used to make batteries for everything from mobile phones to iPads, could transform the war-torn nation's economy.

Mon Jun 14, 2010 12:25 PM ET  
Content provided by Wahedullah Masoud, AFP

MINING.com  
\$1 Trillion  
Motherlode of  
Lithium and Gold  
Discovered in  
Afghanistan |  
MINING.com



THE LITHIUM ION BATTERY  
DANGER COVER-UP

NATIONAL POST

Friday, May 1, 2009

## The problem with lithium

Iaivid Booth, National Post



Pierre Verdy, AFP, Getty Images

How quickly we have forgotten. Yesterday's front-page headline is today's page 13 filler, consigned to the back of the newspaper as something sexier or more pressing forces its way to page one--above the fold.

The subject I'm talking about is oil, the pressing story before all the world's stock markets decided to simultaneously implode. We used to worry about the price of oil and when it would run out, and even on-petrochemical engineers understood the concept of "peak oil." But, whether alternative energy is still big news or not, this much is clear: The world's oil supply is finite, fossil-fuelled vehicles pollute and the public outcry for an alternative is strong.

The leading alternative right now -- if you judge technology by the amount of press generated -- is electric cars. Electric cars don't pollute, electrons are relatively cheap and, perhaps most importantly, these vehicles seem to have captured the imagination of the American consumer, still the greatest economic engine in the world.



**ELON MUSK'S CHILD LABOR CAMPS TO MINE HIS LITHIUM AND COBALT RARE EARTH**

**ELON MUSK'S SHAME**

**LITHIUM MINES & FACTORIES POISON WORKERS**

Inside the Congo mines that exploit children

**ELON MUSK'S "BLOOD MINERAL" CHILD LABOR CAMPS**

YOUR SKIN WHEN A LITHIUM ION BATTERY GOES OFF IN YOUR PANTS

ANOTHER TYPICAL LITHIUM ION BATTERY EXPLOSION

**ELON MUSK'S "BLOOD MINERAL" CHILD LABOR CAMPS**

**ELON MUSK'S "BLOOD MINERAL" CHILD LABOR CAMPS**

**ELON MUSK'S "BLOOD MINERAL" CHILD LABOR CAMPS**

**Mines Linked to Child Labor Are Thriving in Rush for Car Batteries**

**ELON MUSK'S CONGO BLOOD MINERALS**

**I WAS KILLED BY ELON MUSK'S DEADLY LITHIUM ION BATTERIES. I WAS BURNED ALIVE. THANKS ELON!**

**Elon Musk's Congo Child Labor Cobalt Mines Have Caused Millions To Flee Bloodshed As Congo Falls Apart From Musk's Corruption**

**THE LITHIUM ION CORRUPT MINING STOCK MARKET SCAM**

SILICON VALLEY VC CAMPAIGN BACKERS

Google

Greylock

Kleiner Perkins

Vantage Point

Draper Fisher

Khosla Ventures

Firelake

CBRE

Westley Group

etc.....

WHITE HOUSE & CORRUPT SENATORS

1 Owned Users & Buyers of Lithium Ion batteries

2 Afghanistan Mineral Mining For Lithium & Solyndra Materials

3 Paid for Obama's, Reid's & Feinstein's Political Campaigns in Exchange For Policy Decisions

**Energizer**

ULTIMATE